

# TSD File Inventory Index

Date: July 12, 2000  
Initial: CMK/ereno

Facility Name: <u>Betz, Dearborn Inc. (see folder site)</u>			
Facility Identification Number: <u>ILD 009 722 281</u>			
<b>A.1 General Correspondence</b>		<b>B.2 Permit Docket (B.1.2)</b>	
<b>A.2 Part A / Interim Status</b>		<b>.1 Correspondence</b>	
<b>.1 Correspondence</b>	X	<b>.2 All Other Permitting Documents (Not Part of the ARA)</b>	
<b>.2 Notification and Acknowledgment</b>	X	<b>C.1 Compliance - (Inspection Reports)</b>	Y
<b>.3 Part A Application and Amendments</b>	X	<b>C.2 Compliance/Enforcement</b>	Y
<b>.4 Financial Insurance (Sudden, Non Sudden)</b>	X	<b>.1 Land Disposal Restriction Notifications</b>	
<b>.5 Change Under Interim Status Requests</b>		<b>.2 Import/Export Notifications</b>	
<b>.6 Annual and Biennial Reports</b>		<b>C.3 FOIA Exemptions - Non-Releasable Documents</b>	
<b>A.3 Groundwater Monitoring</b>		<b>D.1 Corrective Action/Facility Assessment</b>	Y
<b>.1 Correspondence</b>		<b>.1 RFA Correspondence</b>	
<b>.2 Reports</b>		<b>.2 Background Reports, Supporting Docs and Studies</b>	
<b>A.4 Closure/Post Closure</b>	X	<b>.3 State Prelim. Investigation Memos</b>	
<b>.1 Correspondence</b>	Y	<b>.4 RFA Reports</b>	Y
<b>.2 Closure/Post Closure Plans, Certificates, etc</b>	X	<b>D. 2 Corrective Action/Facility Investigation</b>	
<b>A.5 Ambient Air Monitoring</b>		<b>.1 RFI Correspondence</b>	
<b>.1 Correspondence</b>		<b>.2 RFI Workplan</b>	
<b>.2 Reports</b>		<b>.3 RFI Program Reports and Oversight</b>	
<b>B.1 Administrative Record</b>		<b>.4 RFI Draft /Final Report</b>	

*Total - 1*

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		D.5 Corrective Action/Enforcement	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		E. Boilers and Industrial Furnaces (BIF)	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		G.1 Risk Assessment	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual fee per schedule.*





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

January 9, 1998

REPLY TO THE ATTENTION OF:

BETZ DEARBORN INC.

ATTN: ERNIE TRIPPI

333 S LOMBARD

ADDISON, IL 60601

RE: US EPA ID Number ILD 009 722 281

Location: 333 S LOMBARD

ADDISON, IL 60601

In response to your correspondence of 02/04/97, the following information has been updated:

NAME OF LEGAL OWNER:

BETZ DEARBORN INC.

HAZARDOUS WASTE ACTIVITY:

TRANSPORTER BY HIGHWAY DELETED

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon

RCRA Notifications Coordinator

Waste Management Division

cc: State Agency  
File

RECEIVED

JAN 15 1998

RCRA RECORDS ROOM  
Waste, Pesticides & Toxics Division  
U.S. EPA -- REGION 5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

November 5, 1996

BETZ DEARBORN INC  
ATTN: MICHEAL M. BOBEK  
4636 SOMERTON RD  
TREVOSE, PA 19053-6783

RE: US EPA ID Number ILD 009 722 281  
Location: 333 S LOMBARD  
ADDISON, IL 60101

In response to your correspondence of 08/28/96, the following  
information has been updated:

NAME OF INSTALLATION:

BETZ DEARBORN INC.

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon  
RCRA Notifications Coordinator  
Waste Management Division

cc: State Agency  
File

RECEIVED  
WMD RECORD CENTER

NOV 07 1996





UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:  
RCRA ACTIVITIES

MAR 29 1982

Ernest Trippi, Plant Manager  
Betz Laboratories Inc.  
333 South Lombard Road  
Addison, Illinois 60101

RE: Interim Status Acknowledgement      USEPA ID No. ILD00972281  
FACILITY NAME: Betz Laboratories, Inc.

Dear Mr. Trippi:


This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

  
Karl J. Klepitsch, Jr., Chief  
Waste Management Branch

Enclosure

RB  
3-2

## FACILITY NAME

BETZ LABORATORIES INC

## EPA ID NUMBER

ILD009722281

## FACILITY OPERATOR

BETZ LABORATORIES INC

## FACILITY OWNER

BETZ LABORATORIES INC

## FACILITY LOCATION

333 S LOMBARD RD  
ADDISON

IL 60101

## PROCESS CODE

## DESIGN CAPACITY

## UNIT OF MEASURE

S02	10000.00000	G
T01	10000.00000	U
S01	15000.00000	G

## \*\*\*\*\*KEY\*\*\*\*\*

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE	* * UNIT OF * MEASURE	CODE
STORAGE:				
CONTAINER	S01	G OR L	* GALLONS	G
TANK	S02	G OR L	* LITERS	L
WASTE PILE	S03	Y OR C	* CUBIC YARDS	Y
SURFACE IMPOUNDMENT	S04	G OR L	* CUBIC METERS	C
DISPOSAL:			* GALLONS PER DAY	U
			* LITERS PER DAY	V
			* TONS PER HOUR	D
			* METRIC TONS\HOUR	W
INJECTION WELL	D79	G,L,U, OR V	* GALLONS\HOUR	E
LANDFILL	D80	A OR F	* LITERS\HOUR	H
LAND APPLICATION	D81	B OR Q	* ACRE-FEET	A
OCEAN DISPOSAL	D82	U OR V	* HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G OR L	* ACRES	B
TREATMENT:			* HECTARES	Q
			* POUNDS\HOUR	J
TANK	T01	U OR V	* KILOGRAMS\HOUR	R
SURFACE IMPOUNDMENT	T02	U OR V	* TONS PER DAY	N
INCINERATOR	T03	D,W,E, OR H	* METRIC TONS\DAY	S
OTHER	T04	J,R,N,S,U,V	*	

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0048 Expires 12/31/99  
EPA No. 0048-0001

<p><small>Please refer to Section V, Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).</small></p>		<h2 style="margin:0;">Notification of Regulated Waste Activity</h2> <div style="display: flex; justify-content: space-around; align-items: center;"> <div> <p>United States Environmental Protection Agency</p> </div> </div>																																													<div style="border: 2px solid black; padding: 5px; font-size: 2em; font-weight: bold; letter-spacing: 5px;">RECEIVED</div> <p style="margin: 5px 0;">Date Received (For Official Use Only) <b>JUN 03 2002</b></p> <p style="margin: 5px 0; font-weight: bold;">PROGRAM MANAGEMENT BRANCH</p>														
<p><b>I. Installation's EPA ID Number (Mark 'X' in the appropriate box)</b></p>																																																													
<input type="checkbox"/> A. Initial Notification															<input checked="" type="checkbox"/> B. Subsequent Notification (Complete item C)															<p><b>C. Installation's EPA ID Number</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">I L D 0 0 9 7 2 2 2 8 1</p>																															
<p><b>II. Name of Installation (Include company and specific site name)</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">G E B E T Z I N C</p>																																																													
<p><b>III. Location of Installation (Physical address not P.O. Box or Route Number)</b></p>																																																													
<p><b>Street</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">3 3 3 S L O M B A R D R O A D</p>																																																													
<p><b>Street (Continued)</b></p>																																																													
<p><b>City or Town</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">A D D I S O N</p>																																													<p><b>State</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">I L</p>					<p><b>Zip Code</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">6 0 1 0 1 - 3 0 8 7</p>											
<p><b>County Code</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">0 4 3</p>															<p><b>County Name</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">D U P A G E</p>																																														
<p><b>IV. Installation Mailing Address (See instructions)</b></p>																																																													
<p><b>Street or P.O. Box</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">3 3 3 S L O M B A R D R O A D</p>																																																													
<p><b>City or Town</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">A D D I S O N</p>																																													<p><b>State</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">I L</p>					<p><b>Zip Code</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">6 0 1 0 1 - 3 0 8 7</p>											
<p><b>V. Installation Contact (Person to be contacted regarding waste activities at site)</b></p>																																																													
<p><b>Name (Last)</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">T R I P P I</p>																														<p><b>(First)</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">E R N I E M</p>																															
<p><b>Job Title</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">P L A N T M A N A G E R</p>																														<p><b>Phone Number (Area Code and Number)</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">6 3 0 - 5 4 3 - 8 4 8 0</p>																															
<p><b>VI. Installation Contact Address (See instructions)</b></p>																																																													
<p><b>A. Contact Address Location</b></p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>															<p><b>B. Street or P.O. Box</b></p>																																														
<p><b>City or Town</b></p>																																													<p><b>State</b></p>					<p><b>Zip Code</b></p>											
<p><b>VII. Ownership (See instructions)</b></p>																																																													
<p><b>A. Name of Installation's Legal Owner</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">H E R C U L E S H Y D R O C A R B O N H O L D I N G S</p>																																																													
<p><b>Street, P.O. Box, or Route Number</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">1 3 1 3 N M A R K E T S T R E E T</p>																																																													
<p><b>City or Town</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">W I L M I N G T O N</p>																																													<p><b>State</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">D E</p>					<p><b>Zip Code</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">1 9 8 9 4 - 0 0 0 1</p>											
<p><b>Phone Number (Area Code and Number)</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">3 0 2 - 5 9 4 - 5 0 0 0</p>																														<p><b>B. Land Type</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">P</p>					<p><b>C. Owner Type</b></p> <p style="font-size: 1.2em; letter-spacing: 0.5em;">P</p>					<p><b>D. Change of Owner Indicator</b></p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>										<p><b>Date Changed</b></p> <p>Month Day Year 0 4 3 0 2 0 0 2</p>											

updated ch 6/4/02

ID - For Official Use Only

## VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

## A. Hazardous Waste Activities

1. Generator (See Instructions)
- ☒ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220-2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)

2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes

## Mode of Transportation

- ☐ 1. Air
- ☐ 2. Rail
- ☒ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify \_\_\_\_\_

- ☐ 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.

4. Exempt Boiler and/or Industrial Furnace

- ☐ a. Smelting, Melting, and Refining Furnace Exemption
- ☐ b. Small Quantity On-Site Burner Exemption

- ☐ 5. Underground Injection Control

## C. Used Oil Management Activities

1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)

- ☐ a. Transporter
- ☐ b. Transfer Facility

2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)

- ☐ a. Processor
- ☐ b. Re-refiner

- ☐ 3. Off-Specification Used Oil Burner

4. Used Oil Fuel Marketer

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner

- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

## B. Universal Waste Activity

- ☐ Large Quantity Handler of Universal Waste

## IX. Description of Hazardous Wastes (Use additional sheets if necessary)

- A. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

- B. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See instructions if you need to list more than 4 toxicity characteristic waste codes.)

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	1	2	3	4
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

- C. Other Wastes. (State-regulated or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6

## X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Ernie M. Trippi

Name and Official Title (Type or print)

ERNIE M. TRIPPI

Date Signed

## XI. Comments

SEE ATTACHED LETTER - LAND OWNERSHIP CHANGED

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section IV of the booklet for addresses.)



GE Betz

RECEIVED  
JUN 03 2002

PROGRAM MANAGEMENT BRANCH  
Waste, Pesticides & Toxics Division  
U.S. EPA - REGION 5

May 28, 2002

GE Betz, Inc.  
Addison Plant  
333 S. Lombard Road  
Addison, IL 60101-3087

Certified Mail  
RRR #7000 1670 0004 2095 0700

US EPA Region 5  
RCRA Activities  
77 West Jackson Blvd.  
PO Box A3587  
Chicago, IL 60690

Re: Notification of Regulated Waste Activity

Dear US EPA Region 5:

This month, BetzDearborn Incorporated will transfer title to the real estate at 333 Lombard Road in Addison, IL, to Hercules Hydrocarbon Holdings, Inc. ("HHH"). BetzDearborn continues to operate at the property, although it has changed its name to GE Betz, Inc. As a result of these changes, we are filing a new Form 8700-12.

If you have any questions or require additional information regarding the enclosed forms, please feel free to contact me at 630.543.8480 or Gay Trovei for HHH at 302.549.5560.

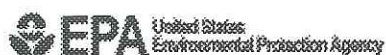
Very truly yours,

Ernie M. Trippi, Plant Manager  
For GE Betz, Inc. f/k/a BetzDearborn Incorporated

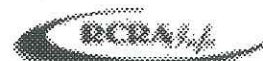
cc: Andrew Hogeland  
Gay Trovei  
Annemargaret Connolly

RECEIVED  
JUN 07 2002

RCRA RECORDS ROOM  
Waste, Pesticides & Toxics Division  
U.S. EPA - REGION 5



# Handler Confirmation Screen



GE BETZ INC

ADDISON

ILD009722281

Last Updated By: CVK

Last Updated On: 6/4/2002 2:28:10 PM

The following information was processed:

## General Information:

Source	Received Date	Non-notifier	Extract Flag	Acknowledgement Flag	Acknowledgement Date
N	6/4/2002		X		

## III. Location of Installation (Physical address not P.O. Box or Route)

Number:	Street1:	Street2:	City:	State:	Zip code:	County:	State District
	333 S LOMBARD RD		ADDISON	IL	60101	DU PAGE	

## IV. Installation Mailing address

Number:	Street1:	Street2:	City:	State:	Zip code
	333 S LOMBARD RD		ADDISON	IL	601013087

## V. Installation Contact (Person to be contacted regarding waste activities at site):

First Name:	Last Name:	Job Title:	Phone Number:
ERNEST	TRIPPI	PLT MGR	6305438480

## VI. Installation Contact Address:

Street1/P.O. Box:	Street2/P.O. Box:	City:	State:	Zip code:
333 S LOMBARD RD		ADDISON	IL	601013087

## VII. Ownership:

Owner No.	Name of Legal Owner:	Street1 or P.O. Box:	Street2 or P.O. Box:	City:	State:	Zip code	Phone Number:	Land Type:	Owner Type:	Change Date:
1	hercules hydrocarbon holdings	1313 n market st		wilmington	DE	198940001	3025945000	P	P	4/30/2002

RECEIVED  
JUN 07 2002

RCRA RECORDS ROOM  
Waste, Pesticides & Toxics Division  
U.S. EPA—REGION 5

**VIII. Type of Federal Regulated Waste Activity:****A. Hazardous Waste Activity**

	Type	Federally Regulated	Federal Description	State Regulated	State Description
Generator	1	R			
Transporter					
Mode of Transportation	Air	Rail	Highway	Water	Other
Treater, Storer, Disposer					
Hazardous Waste Fuel					
Other Activity(ies)		Underground Injection Control			

**B. Universal Waste Activity:**



**C. Used Oil Management Activities:****1. Used Oil Fuel Marketer**

	Marketer Directs Shipment of Used Oil to Off-Specification Burner
	Marketer Who First Claims the Used Oil Meets the Specifications

**2. Used Oil Transporter Activity****3. Used Oil Processor/Re-refiner Activity****4. Off-Specification Used Oil Burner**

Type D	Type F	Type K	Type P	Type U	Type X
D001					
D002					

**X. Comments:**Continue

URL: /Handler/Hand\_Notif\_addupd\_rtn.asp

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JUN 27 2002  
RCRA RECORDS ROOM  
Waste, Pesticides & Toxics Division  
U. S. EPA—REGION 5

Print or type with ELITE type (12 characters per inch) in the unshaded areas only

0430050007

Form Approved, OMB No. 2050-0028 Expires 9-30-96  
GSA No. 0246-EPA-OT

Refer to the instructions  
filling Notification before  
completing this form. The  
information requested here is  
required by law (Section 3010  
of the Resource Conservation  
and Recovery Act).



# Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received  
(For Official Use Only)

FEB 25 1997

## I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐ A. First Notification

☒ B. Subsequent Notification  
(Complete Item C)

### C. Installation's EPA ID Number

I L D 0 0 9 7 2 2 2 8 1

## II. Name of Installation (Include company and specific site name)

B e t z D e a r b o r n I n c .

## III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

333 S L O M B A R D R D

Street (Continued)

RECEIVED

FEB 11 1997

City or Town

A D D I S O N

State

Zip Code

TL

60101-

County Code

County Name

043 D U P E G E

## IV. Installation Mailing Address (See instructions)

Street or P.O. Box

333 S L o m b a r d R d .

City or Town

A d d i s o n

State

Zip Code

IL

60101-

## V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

T r i p p i

E r n i e

Job Title

Phone Number (Area Code and Number)

P l a n t M a n a g e r

630-543-8480

## VI. Installation Contact Address (See instructions)

A. Contract Address  
Location Mailing Other

B. Street or P.O. Box

☒

City or Town

State

Zip Code

## VII. Ownership (See instructions)

### A. Name of Installation's Legal Owner

B e t z D e a r b o r n I n c .

Street, P.O. Box, or Route Number

4636 S o m e r t o n R d .

City or Town

T r e v o s e

State

Zip Code

PA

16950-56783

Phone Number (Area Code and Number)

215-355-3300

B. Land Type

C. Owner Type

D. Change of Owner  
Indicator

(Date Changed)  
Month Day Year

P

P

Yes

No

X

Continued on Reverse

RCRIS ENTRY DEC 18 1997

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

ID - For Official Use Only									
I	L	D	0	0	9	7	2	2	8

**VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)**

### A. Hazardous Waste Activity

- ☒ 1. Generator (See Instructions)
- ☐ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (200-2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs)
- ☐ 2. Transporter (Indicate Mode in boxes 1-5 below)
- ☒ a. For own waste only
- ☐ b. For commercial purposes
- Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☒ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify
- ☐ 3. Treater, Storer, Disposer (at Installation) Note: A permit is required for this activity; see instructions.
- ☐ 4. Hazardous Waste Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Boiler and/or Industrial Furnace
- ☐ 1. Smelter Deferral
- ☐ 2. Small Quantity Exemption
- Indicate Type of Combustion Device(s)
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

### B. Used Oil Recycling Activities

1. Used Oil Fuel Marketer
  - ☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
  - ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)
  - ☐ a. Utility Boiler
  - ☐ b. Industrial Boiler
  - ☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Activity(ies)
  - ☐ a. Transporter
  - ☐ b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
  - ☐ a. Process
  - ☐ b. Re-refine

## IX. Description of Hazardous Wastes (Use additional sheets if necessary)

**A. Characteristics of Nonlisted Hazardous Wastes.** (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

- [illegible]

**B. Listed Hazardous Wastes.** (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">1</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">7</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">2</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">8</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">3</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">9</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">4</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">10</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">5</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">11</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">6</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">12</div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>
--	--	--	---	---	---

**C. Other Wastes.** (State or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6

### X Certification

**X. Certification**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Official Title (Type or print) \_\_\_\_\_ Date Signed \_\_\_\_\_

**Signature**

Ernest Hagg

Name and Official Title (Type or print)

Ernie Trippi - Plant Manager

**Date Signed**

214/97

## XI. Comments

Company Name Change, New Site Contact, Delete Transporter Status - Never Conducted

## Activity

**Note:** Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only.

RECEIVED

\* file in Part A

Form Approved. OMB No. 2050-0028. Expires 10-31-91  
EPA No. 0246-EPA-OT

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



EPA

# Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received  
(For Official Use Only)

AUG 03 1993

## I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

B. Subsequent Notification  
(complete item C)

C. Installation's EPA ID Number

ILD 009722281

## II. Name of Installation (Include company and specific site name)

BETZ LABORATORIES

## III. Location of Installation (Physical address not P.O. Box or Route)

Street

333 SOUTH LOMBARD

Street (continued)

City or Town

ADDISON

County Code

County Name

DUPAGE

## IV. Installation Mailing Address (See instructions)

Street or P.O. Box

City or Town

## V. Installation Contact (Person to be contacted regarding waste activities)

Name (last)

TRIPIPI

(first)

ERNEST

Job Title

PLANT MANAGER

Phone Number (area code and number)

708-543-8480

## VI. Installation Contact Address (See instructions)

A. Contact Address  
Location Mailing

☒☐

B. Street or P.O. Box

City or Town

State

ZIP Code

## VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

BETZ LABORATORIES INC.

Street, P.O. Box, or Route Number

4636 SOMERTON RD.

City or Town

TREVOSE

State

ZIP Code

PA 19053

Phone Number (area code and number)

215-355-3300

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

X

(Date Changed)  
Month Day Year

ID - For Official Use Only

## VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activities		B. Used Oil Fuel Activities	
<input checked="" type="checkbox"/> 1. Generator (See instructions) <input type="checkbox"/> a. Greater than 1000 kg/mo (2200 lbs) <input type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2200 lbs) <input type="checkbox"/> c. Less than 100 kg/mo (220 lbs) <input type="checkbox"/> 2. Transporter (Indicate Mode in boxes 1-5 below) <input type="checkbox"/> a. For own waste only <input type="checkbox"/> b. For commercial purposes Mode of Transportation: <input type="checkbox"/> 1. Air <input type="checkbox"/> 2. Rail <input type="checkbox"/> 3. Highway <input type="checkbox"/> 4. Water <input type="checkbox"/> 5. Other - specify: _____		<input type="checkbox"/> 1. Generator (See instructions) <input type="checkbox"/> a. Greater than 1000 kg/mo (2200 lbs) <input type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2200 lbs) <input type="checkbox"/> c. Less than 100 kg/mo (220 lbs) <input type="checkbox"/> 2. Transporter (Indicate Mode in boxes 1-5 below) <input type="checkbox"/> a. For own waste only <input type="checkbox"/> b. For commercial purposes Mode of Transportation: <input type="checkbox"/> 1. Air <input type="checkbox"/> 2. Rail <input type="checkbox"/> 3. Highway <input type="checkbox"/> 4. Water <input type="checkbox"/> 5. Other - specify: _____	

## IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)    2. Corrosive (D002)    3. Reactive (D003)    4. Toxicity (D004)

List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s)

<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-------------------------------------	-------------------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an ID number. See instructions.)

1	2	3	4	5	6

## X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature <i>Ernest Thripp</i>	Name and Official Title (type or print) <i>Plant Manager</i>	Date Signed <i>7-26-93</i>
-----------------------------------	---	-------------------------------

## XI. Comments

*This is to document elimination of D007.*

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III for the appropriate address.)

U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITYINSTALLATION'S EPA  
I.D. NO.

ILD009722281

NAME OF IN-  
STALLATIONINSTALLATION  
MAILING  
ADDRESSBETZ LABORATORIES INC  
333 S LOMBARD Rd  
ADDISON, IL 60101

000493 AUG

LOCATION  
OF INSTAL-  
LATION333 S LOMBARD Rd  
ADDISON, IL 60101

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, stored, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## FOR OFFICIAL USE ONLY

## COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED  
(yr., mo., & day)

F 1 LD 009722281

A

800812

## I. NAME OF INSTALLATION

BETZ LABORATORIES, INC.

## II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

333 S. Lombard Rd.

CITY OR TOWN

Addison

ST.

ZIP CODE

IL 60101

## III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5333 S. Lombard Rd.

CITY OR TOWN

Addison

ST.

ZIP CODE

IL 60101

## IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, &amp; job title)

PHONE NO. (area code &amp; no.)

2 Trippi, Ernest, Plant Manager

312-543-8480

## V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 BETZ LABORATORIES, INC.

B. TYPE OF OWNERSHIP  
(enter the appropriate letter into box)F = FEDERAL  
M = NON-FEDERAL

M

## VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☒ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☒ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

1 LD 009722281

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

☒ 4. TOXIC  
(D000)

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

DATE SIGNED \_\_\_\_\_

8-11-80

0430050007  
DUPLICATE to *then  
corr*



BetzDearborn Inc.  
4636 Somerton Road  
PO Box 3002  
Trevose, PA 19053-6783  
215 355-3300

28 August, 1996

Mr. Jim Pierce  
Environmental Information Support Unit  
Illinois EPA  
Bureau of Land #24  
2200 Churchill Rd.  
Springfield, IL 62706

RE:  
BetzDearborn Inc.  
333 S. Lombard  
Addison, IL 60101  
Site ID: **ILD009722281**  
Permit: Not Applicable  
Subject: waste status

*Name change*

Dear Mr. Jim Pierce:

In accordance with rules pertaining to the delegation authority for a corporation, attached please find a resolution which assigns authority in accordance with our corporate procedures. The duly authorized representative for the following Facility or Production Plant, is the Plant Manager position.

BetzDearborn Inc.  
E. M. Trippi, Plant Manager  
Addison, IL 60101

For future correspondence, please adjust your records accordingly. Should BetzDearborn Inc. be required to complete any other forms of notification in this regard, please send the instructions to my attention. Thank you for your help in this regard.

Sincerely,

BetzDearborn Inc.

*Michael M. Bobek*

Michael M. Bobek  
Manager, Environmental Controls Group

c: E. M. Trippi, Plant Manager  
M. A. Palis, Sr. Environmental Engineer → Addison file

RECEIVED  
WMD RECORD CENTER

NOV 07 1996

RECEIVED

SEP 03 1996

IEPA/DLPC

RCRIS ENTRY OCT 18 1996

RCRIS

SEP 12 1996

**BETZDEARBORN INC.**

**RECEIVED**

**ADMINISTRATIVE COMMITTEE MEETING**

SEP 03 1996

IEPA/DLPC

**RESOLVED:** That the Production Plant Manager or Facility Manager, be and hereby is authorized to execute, on behalf of this Corporation, notices, applications, plans, reports, permits, certifications or other information about the designated facility under his/her authority, said documents to be filed with respective governmental agencies having administrative responsibility for matters pertaining to environmental and community right-to-know regulations.

**FURTHER RESOLVED:** That the Production Plant Manager or Facility Manager is further authorized to take steps to provide for the continued compliant construction, operation and maintenance of the facility in accordance with existing or acquired permit(s), approvals or determinations.

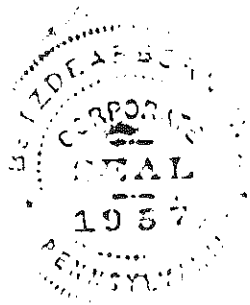
**CERTIFICATION**

I certify that the above Resolutions are a true and correct copy of the Resolutions adopted by the Administrative Committee of the Board of Directors of BetzDearborn Inc. on August 21, 1996, the original of which is in the Minute Book of the Company, which Resolutions have not been amended or rescinded.

8-22-96

Date

William C. Brafford  
William C. Brafford, Secretary



SEP 12 1996

**RECEIVED**  
WMD RECORD CENTER

NOV 07 1996



25 July, 1996

Illinois EPA  
Bureau of Land #24  
2200 Churchill Rd.  
Springfield, IL 62706

RE: Betz Laboratories, Inc.  
333 S. Lombard  
Addison, IL 60101  
Permit Number: Not Applicable

To whom it may concern:

Please be advised that effective 1 July, 1996, the referenced permit holder company name has changed to **BetzDearborn, Inc.** For future correspondence, please adjust your records accordingly. Should BetzDearborn be required to complete any other forms of notification in this regard, please send the instructions to my attention. Thank you for your help in this regard.

Sincerely,

BetzDearborn, Inc.



Michael M. Bobek,  
Manager, Environmental Controls Group

c: E. M. Trippi, Plant Manager  
M. A. Palis, Senior Environmental Engineer

File

BetzDearborn Inc.  
4636 Somerton Road  
PO Box 3002  
Trevose, PA 19053-6783  
215 355-3300

**RECEIVED**  
AUG 06 1996  
OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V

ILD0009722281

I MAILED 8700-12  
TO THEM 07/31/96  
Jim Rieve

**RECEIVED**  
JUL 31 1996  
EPA  
PERMIT SET

**RECEIVED**  
WMD RECORD CENTER

OCT 04 1996

*Betz Laboratories, Inc.*  
333 South Lombard Road  
Addison, IL 60101-3087  
708-543-8480  
Fax: 708-543-7316

July 26, 1993

Mr. Jim Pierce  
Illinois Environmental Protection Agency  
Land Division #24  
P.O. Box 19276  
Springfield, IL 62794-9276

Re: Betz Laboratories, Inc.  
ILD 009722281  
DuPage County

Dear Mr. Pierce,

Per your conversation with Michael M. Bobek of Betz Laboratories, Inc. Environmental & Regulatory Affairs, enclosed you will find our subsequent notification on Form 8700-12.

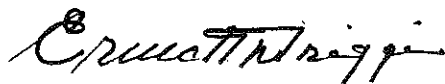
The purpose of this notification is to announce the elimination of chromium bearing (D007) wastes from this plant's operation.

Since it is still unclear as to whether the Addison facility will move to a small quantity generator status, as a result of chromium elimination, we are presently retaining generator status.

Please contact me at 708-543-8480 if you have any questions in this regard.

Sincerely,

BETZ LABORATORIES, INC.



Ernest M. Trippi  
Plant Manager

EMT:cs  
Enclosure

**RECEIVED**

JUL 29 1993

EPA/DLPC



Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

217/782-6761

Refer to: 0430050007 - DUPAGE CO.  
Betz Laboratories, Inc.  
ILD009722281  
RCRA Part A 450

November 27, 1991

Betz Laboratories  
Attn: Ernest Trippi  
333 South Lombard Road  
Addison, Illinois 60101

Dear Mr. Trippi:

Upon review of your November 16, 1991 letter regarding withdrawal of the Part A application for the subject facility, the Agency confirms that the Betz Laboratories should be reclassified as a generator only status and the Part A withdrawn.

Your I.D. Number (ILD009722281) will be retained in case this facility generates, stores, treats, or disposes of regulated quantities of hazardous waste in the future.

Should you have any questions regarding this matter please contact William T. Sinnott II at 217/782-6762.

Very truly yours,

Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

ALD  
LWE:MTS:sf/3523q,29

cc: Planning and Reporting Section  
Maywood Region  
Financial Assurance - Andy Vollmer  
USEPA Region V - George Hamper  
Division File - RCRA Part A  
William T. Sinnott II  
USEPA Region V - Jane Radcliff

**LABORATORIES, INC.**

SOMERTON ROAD • TREVOSE, PENNSYLVANIA 19347 • U.S.A. / TELEPHONE: 215 • 855-3300 • TELEX: 173 148  
ADDISON PLANT 800 SOUTH LUMBER ROAD • ADDISON, ILLINOIS 60101 • TELEPHONE: 312 • 848-8486

November 6, 1991

Illinois Environmental Protection Agency  
Attn: William F. Sinnott II  
Permit Section/Division of Land Pollution Control  
2200 Churchill Road  
P.O. Box 19276  
Springfield, IL 62794-9276

RECEIVED  
WMD RECORD CENTER

JUN 02 1994

Re: Part A Withdrawal  
Beta Laboratories, Inc.  
DuPage County  
ILD 009722281  
0430050007

Dear Mr. Sinnott,

This letter is in reference to our conversation in June of this year, in which you requested my certification on several application withdrawal issues.

Although I was not personally involved with the development of the Part A application filed on November 13, 1980, my subsequent discussions with Plant Management personnel and Corporate Environmental Affairs staff indicated that the Part A was filed originally for protective measures. Also, at that time, it was speculated that the Addison plant would eventually conduct Drum Storage (S01), Tank Storage (S02), and Treatment in Tanks (T01). The reality is that none of these processes were used at the plant. I am hereby certifying that the routine waste stream was only accumulated for less than 90 days in a tank. Again, my understanding is that the process codes: T01, S01, S02 were originally shown on the Part A because it was felt that the plant operations would move in this direction, yet these processes never were necessary because of our ability to have wastes treated at off-site locations on a less than 90 day frequency.

Therefore, as a supplement to our November 4, 1988 Part A Withdrawal Request submission to Mr. L. W. Eastop of your office, I formally request the check and accept this certification that process codes S01, S02 and T01 were never used, and that this Part A withdrawal is complete and final.

Beta Laboratories Inc. prefers receiving written notice from the IEPA regarding the acceptance of this withdrawal and I would appreciate it, if you would direct your response to my attention.

Illinois Environmental Protection Agency  
Springfield, IL  
November 6, 1991  
Page 2

Bill, if you have any questions regarding this matter please give me a call at  
708-543-8480. Thank you for your continuing assistance.

Sincerely,

BETZ LABORATORIES, INC.



Ernest M. Trippi  
Plant Manager

EMT:cs

<b>FORM 1</b> <b>GENERAL</b>		<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>GENERAL INFORMATION</b> <i>Consolidated Permits Program</i> (Read the "General Instructions" before starting.)		<b>I. EPA I.D. NUMBER</b> F I L D 0 0 9 7 2 2 2 8 1 3 D	
<b>LABEL ITEMS</b>		<b>PLEASE PLACE LABEL IN THIS SPACE</b>		<b>GENERAL INSTRUCTIONS</b>	
<b>II. FACILITY NAME</b>				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
<b>V. FACILITY MAILING ADDRESS</b>					
<b>VI. FACILITY LOCATION</b>					

**II. POLLUTANT CHARACTERISTICS**

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

**III. NAME OF FACILITY**

1 SKIP BETZ LABORATORIES INC

**IV. FACILITY CONTACT**

<b>A. NAME &amp; TITLE (last, first, &amp; title)</b>		<b>B. PHONE (area code &amp; no.)</b>	
2	TRIPPI E PLANT MANAGER	3 1 2	5 4 3 8 4 8 0

**V. FACILITY MAILING ADDRESS**

<b>A. STREET OR P.O. BOX</b>		<b>B. CITY OR TOWN</b>		<b>C. STATE</b>	<b>D. ZIP CODE</b>
3	3 3 3 S. LOMBARD RD	4	A D D I S O N	I L	6 0 1 0 1

**VI. FACILITY LOCATION**

<b>A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER</b>		<b>B. COUNTY NAME</b>		<b>C. CITY OR TOWN</b>	<b>D. STATE</b>	<b>E. ZIP CODE</b>	<b>F. COUNTY CODE (if known)</b>
5	3 3 3 S. LOMBARD RD	6	D U P A G E	6	A D D I S O N	I L	6 0 1 0 1 0 4 3

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND											
C	7	2	8	9	9	(specify)					C	7	(specify)								
15	16	19									15	16	19								
C. THIRD										D. FOURTH											
C	7	(specify)									C	7	(specify)								
15	16	19									15	16	19								

VIII. OPERATOR INFORMATION

A. NAME																																																		B. Is the name listed in Item VIII-A also the owner?										
C	8 B E T Z L A B O R A T O R I E S I N C																																																		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO									
15	16	55																																																66										
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																																								D. PHONE (area code & no.)																				
F = FEDERAL										M = PUBLIC (other than federal or state)										P = PRIVATE										O = OTHER (specify)										C	A	2 1 5					3 5 5					3 3 0 0								
S = STATE																																								15					16 - 19					19 - 21					22 - 25					
E. STREET OR P.O. BOX																																																												
4 6 3 6 S O M E R T O N R D																																																		55										
F. CITY OR TOWN																																								G. STATE					H. ZIP CODE					IX. INDIAN LAND										
B T R E V O S E																																								P A					1 9 0 4 7					Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO										
15 16																																								40 41 42					47 - 51					52										

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)														
C	T	I													C	T	I												
9	N		15 16 17 18 30												9	P		15 16 17 18 30											
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)														
C	T	I													C	T	I	(specify)											
9	U		15 16 17 18 30												9			15 16 17 18 30											
C. RCRA (Hazardous Wastes)															E. OTHER (specify)														
C	T	I													C	T	I	(specify)											
9	R		15 16 17 18 30												9			15 16 17 18 30											

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9A F9A/50

XII. NATURE OF BUSINESS (provide a brief description)

PROCESSING AND SALE OF WATER TREATMENT AND INDUSTRIAL PROCESS IMPROVEMENT CHEMICALS.

F9A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
R. ZICKERMAN, VP-PRODUCTION	<i>R. Zickerman</i>	11/13/80

COMMENTS FOR OFFICIAL USE ONLY

C																																														C
15	16																																												55	

**CONTINUE ON REVERSE**

**III. PROCESSES (continued)**

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

- A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE                      CODE  
POUNDS . . . . . P  
TONS . . . . . T

METRIC UNIT OF MEASURE                      CODE  
KILOGRAMS . . . . . K  
METRIC TONS . . . . . M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

- 2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

112

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY									
W I L D 0 0 9 7 2 2 2 8 1 3 1															W DUP 3 2 DUP									
V. DESCRIPTION OF HAZARDOUS WASTES (continued)															D. PROCESSES									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))												
				23	24	25	26	27	28	29	30	31	32	33										
1	D 0 0 1	300,000	T	S 0 1	S 0 2	T 0 1								COMMERCIAL DISPOSAL SITE										
2	D 0 0 2	500,000	T	S 0 1	S 0 2	T 0 1								" " "										
3	D 0 0 3	300,000	T	S 0 1	S 0 2	T 0 1								" " "										
4	D 0 0 7	50,000	T	S 0 1	S 0 2	T 0 1								" " "										
5																								
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26																								

## IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 1.

EPA I.D. NO. (enter from page 1)

S	F	I	L	D	0	0	9	7	2	2	2	8	1	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

F6A/55

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

## VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6A/56

## VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, &amp; seconds)

LONGITUDE (degrees, minutes, &amp; seconds)

4	1	55	14
65	66	67	68

8	8	01	25
72	73	74	75

## VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

## IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

RICHARD C. ZICKERMAN

B. SIGNATURE

Richard C. Zickerman

C. DATE SIGNED

11/13/80

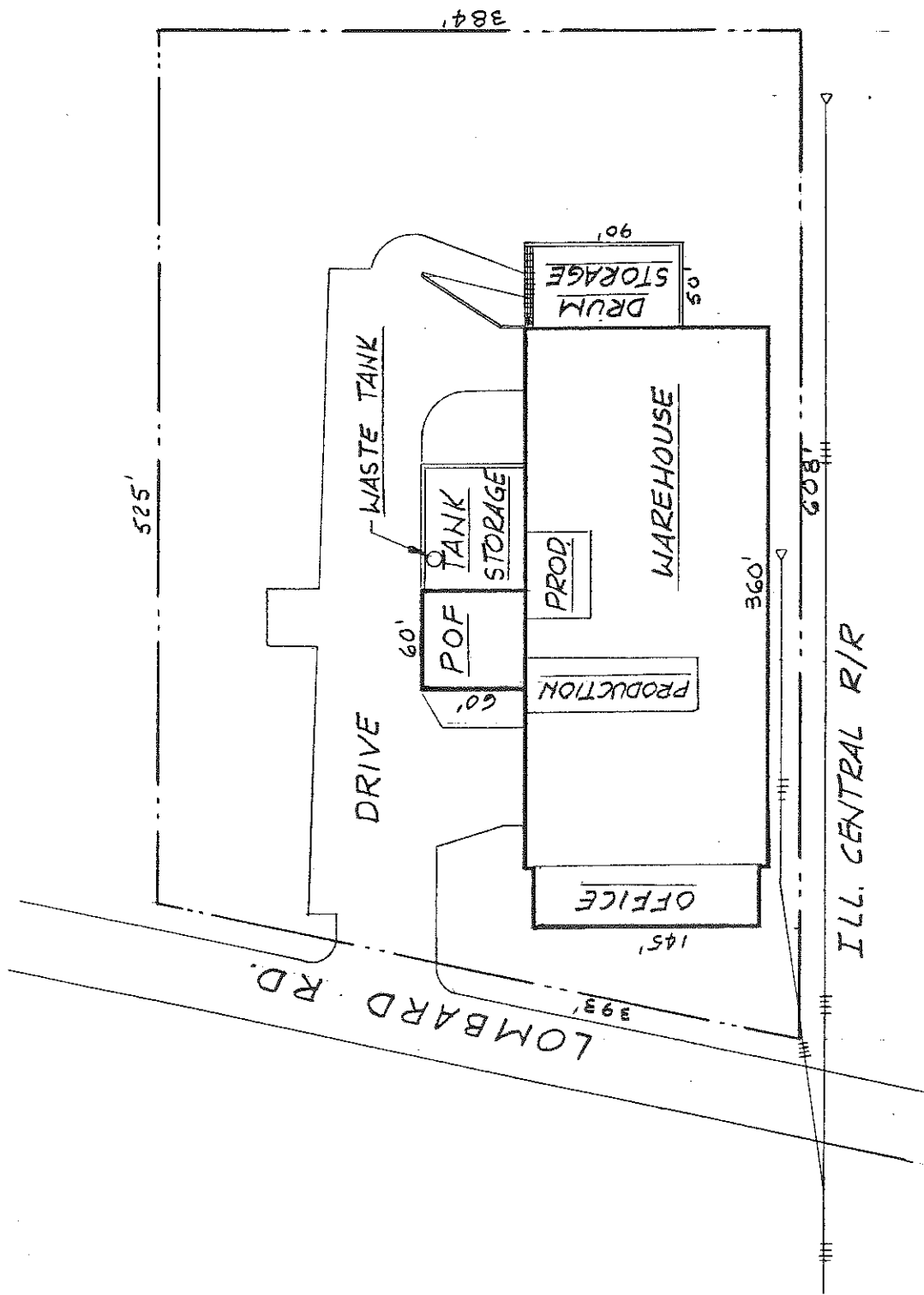
## X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED



**BETZ**

ADDISON PLANT PLOT PLAN

PLANT ADDISON, ILL.

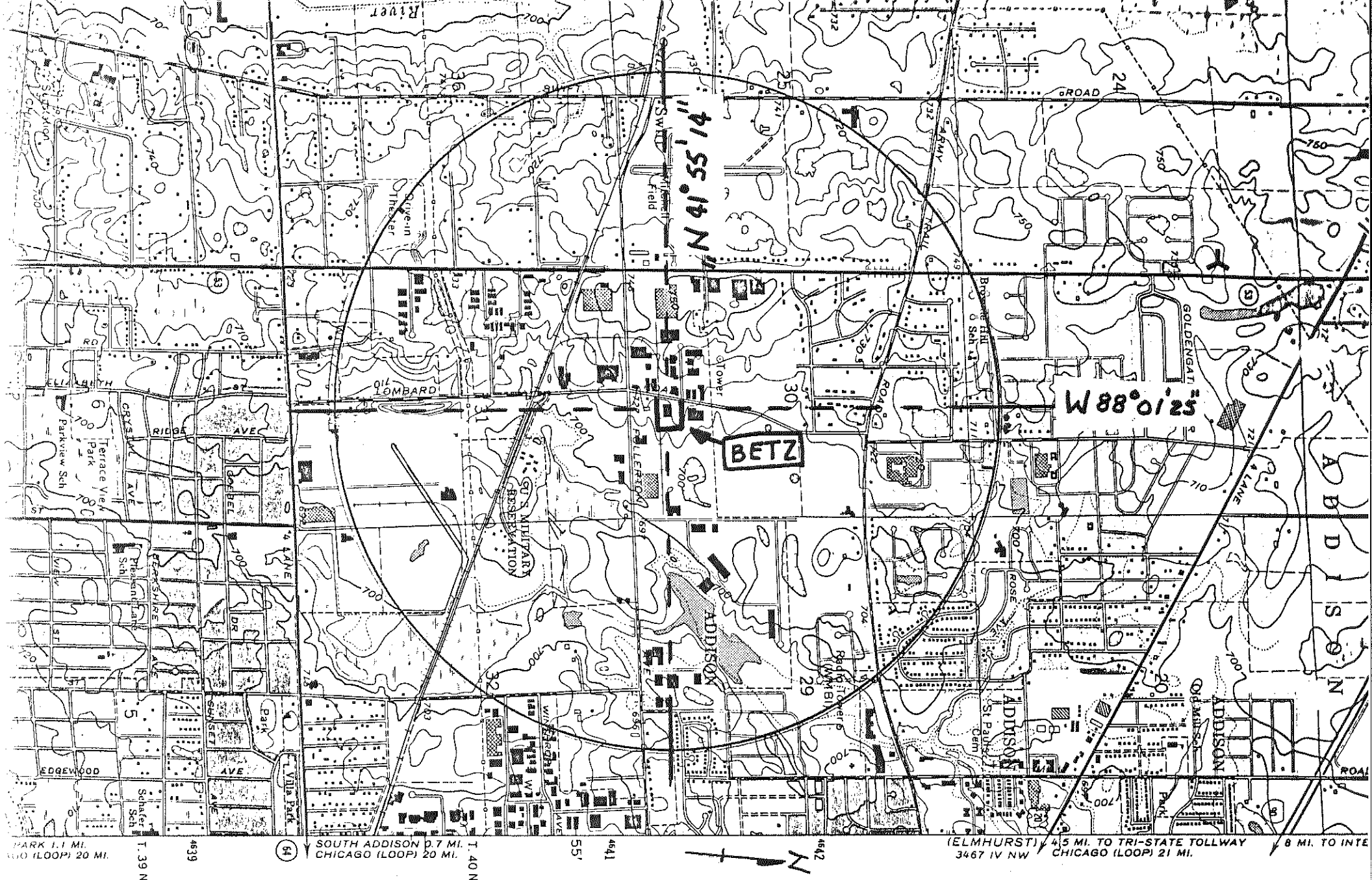
DATE 10-80

ENG. G.C. EBLE

DWG. NO. 03A008

SCALE 1" = 100'

REV.

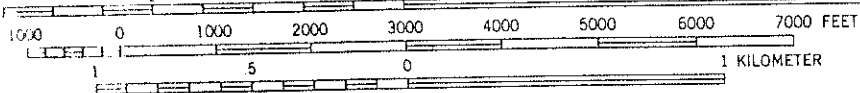


SCALE 1:24 000

7.5 MINUTE

1 MILE

- N 41° 55' 14"  
- W 88° 01' 25"



CONTOUR INTERVAL 10 FEET  
DOTTED LINES REPRESENT 5-FOOT CONTOURS  
DATUM IS MEAN SEA LEVEL

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U.S. GEOLOGICAL SURVEY, WASHINGTON, D. C. 20242  
AND BY THE STATE GEOLOGICAL SURVEY, URBANA, ILLINOIS 61801  
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

LOMBARD, ILL.

NE/4 WHEATON 15' QUADRANGLE

N4152.5—W8800/7.5

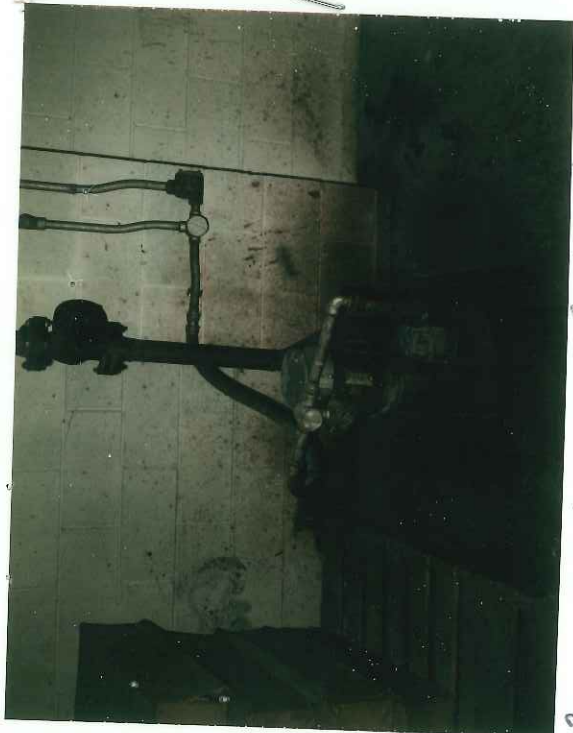
1962

PHOTOREVISED 1972

AMS 3387 1 NE—SERIES V863 QUADRANGLE LOCATION



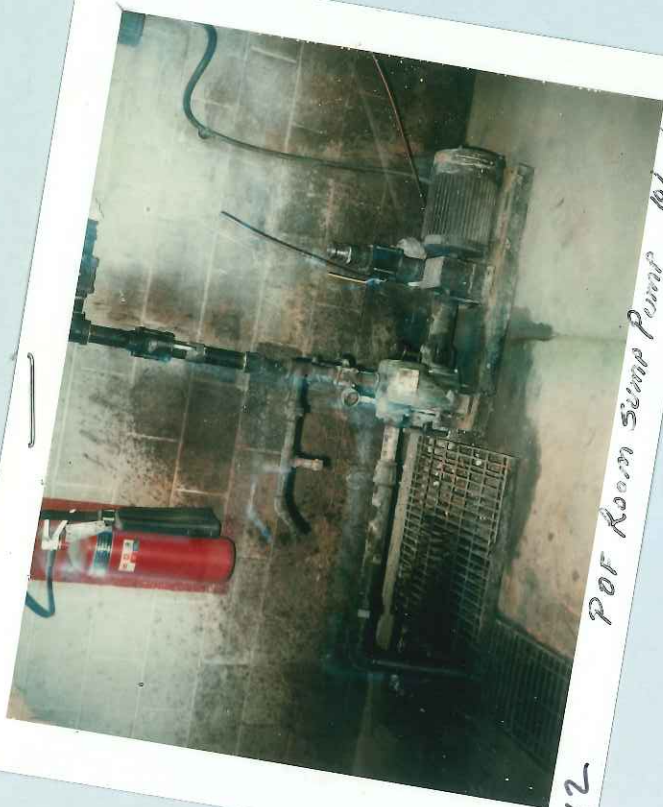
112



112 EP Room Sump Pump 10/21/80



112 Tank Farm Sump Pump 10/21/80



112 POF Room Sump Pump 10/21/80



112 ADDISON WASTE TANK 10/21/80





LABORATORIES, INC.

THE WATER AND ENERGY  
MANAGEMENT COMPANY

SOMERTON ROAD • TREVOSE, PENNSYLVANIA 19047 • U.S.A. / TELEPHONE: 215 • 355-3300 • TELEX 84-5159

March 25, 1986

Regional Administrator  
U. S. Environmental Protection Agency  
Region V  
230 S. Dearborn Street  
Chicago, IL 60604

Dear Sir:

I am the chief financial officer of Betz Laboratories, Inc., 4636 Somerton Road, Trevose, PA 19047. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

Betz Laboratories, Inc.  
3000 Pegasus Road  
Airport Industrial Park  
Bakersfield, CA 93308  
EPA ID # CAT 080012974

Betz Laboratories, Inc.  
3154 E. Harcourt Street  
Compton, CA 90221  
EPA ID # CAD 002604866

Betz Laboratories, Inc.  
7525 N. E. Industrial Blvd.  
Macon, GA 31201  
EPA ID # GAD 057281156

Betz Laboratories, Inc.  
33 S. Lombard Road  
Addison, IL 60106  
EPA ID # ILD 009722281

Betz Laboratories, Inc.  
2118 Reiser Avenue, S.E.  
New Philadelphia, OH 44663  
EPA ID # OHD 070751268

March 25, 1986

Betz Laboratories, Inc.  
985 Wheeler Way  
Langhorne, PA 19047  
EPA ID # PAD 000824805

Betz Laboratories, Inc.  
4636 Somerton Road  
Trevose, PA 19047  
EPA ID # PAD 009722265

Betz Laboratories, Inc.  
2222 Lonneck Drive  
Garland, TX 75041  
EPA ID # TXD 062871736

Betz Laboratories, Inc.  
6900 Nelms Avenue  
Central Industrial Park  
Houston, TX 77061  
EPA ID # TXD 980624340

Betz Laboratories, Inc.  
3901 Williams Drive  
West Orange, TX 77630  
EPA ID # TXD 042917401

Betz Laboratories, Inc.  
9669 Grogans Mill Road  
Woodlands, TX 77380  
EPA ID # TXD 097304646

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

Betz Laboratories, Inc.  
3000 Pegasus Road  
Airport Industrial Park  
Bakersfield, CA 93308  
EPA ID # CAT 080012974  
Closure Cost Estimate: \$9,040

March 25, 1986

Betz Laboratories, Inc.  
3154 E. Harcourt Street  
Compton, CA 90221  
EPA ID # CAD 002604866  
Closure Cost Estimate: \$10,720

Betz Laboratories, Inc.  
2118 Reiser Avenue, S.E.  
New Philadelphia, OH 44663  
EPA ID # OHD 070751268  
Closure Cost Estimate: \$11,230

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

NONE

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

Betz Laboratories, Inc.  
985 Wheeler Way  
Langhorne, PA 19047  
EPA ID # PAD 000824805  
Closure Cost Estimate: \$18,870

Betz Laboratories, Inc.  
4636 Somerton Road  
Trevose, PA 19047  
EPA ID # PAD 009722265  
Closure Cost Estimate: \$24,490

Betz Laboratories, Inc.  
7525 N. E. Industrial Blvd.  
Macon, GA 31201  
EPA ID # GAD 057281156  
Closure Cost Estimate: \$63,520

March 25, 1986

Betz Laboratories, Inc.  
33 S. Lombard Road  
Addison, IL 60106  
EPA ID # ILD 009722281  
Closure Cost Estimate: \$12,400

Betz Laboratories, Inc.  
2222 Lonneck Drive  
Garland, TX 75041  
EPA ID # TXD 062871736  
Closure Cost Estimate: \$34,100

Betz Laboratories, Inc.  
6900 Nelms Avenue  
Central Industrial Park  
Houston, TX 77061  
EPA ID # TXD 980624340  
Closure Cost Estimate: \$13,430

Betz Laboratories, Inc.  
3901 Williams Drive  
West Orange, TX 77630  
EPA ID # TXD 042917401  
Closure Cost Estimate: \$17,260

Betz Laboratories, Inc.  
9669 Grogans Mill Road  
Woodlands, TX 77380  
EPA ID # TXD 097304646  
Closure Cost Estimate: \$9,300

4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

NONE

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

March 25, 1986

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1985.

Part A. Not Applicable

Part B. Closure or Post-closure Care and Liability Coverage

ALTERNATIVE 1

1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above).	\$ 224,360
2. Amount of annual aggregate liability coverage to be demonstrated.	\$ 2,000,000
3. Sum of Lines 1 and 2	\$ 2,224,360
*4. Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 5 and 6).	\$ 58,910,710
*5. Tangible net worth	192,807,774
*6. Net worth	194,793,346
*7. Current assets	87,850,999
*8. Current liabilities	38,590,277
9. Net working capital (line 7 minus line 8)	49,260,722
*10. The sum of net income plus depreciation, depletion, and amortization	50,913,839
*11. Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	215,469,437 (85%)


March 25, 1986

	YES	NO
12. Is line 5 at least \$10 million?	X	
13. Is line 5 at least 6 times line 3?	X	
14. Is line 9 at least 6 times line 3?	X	
*15. Are at least 90% of firm's assets located in the U.S.? If not, complete line 16.		X
16. Is line 11 at least 6 times line 3?	X	
17. Is line 4 divided by line 6 less than 2.0?	X	
18. Is line 10 divided by line 4 greater than 0.1?	X	
19. Is line 7 divided by line 8 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

Very truly yours,

BETZ LABORATORIES, INC.



R. Dale Voncanon  
Chief Financial Officer

March 25, 1986

# Ernst & Whinney

2900 Centre Square West  
Philadelphia, Pennsylvania 19102

215/561-4800

Betz Laboratories, Inc.  
Trevose, PA 19047

Gentlemen:

We have examined the consolidated financial statements of Betz Laboratories, Inc., as of and for the year ended December 31, 1985, and issued our report thereon dated January 28, 1986.

In connection with the Company's letter dated March 25, 1986, to the Environmental Protection Agency pursuant to 40 CFR 264.151(g), and/or to the appropriate state environmental authority, we have compared or computed the amounts identified with an asterisk (\*) in paragraph 4, Part B, Alternative 1 of that letter with the amounts shown in or obtained from the financial statements referred to above, and found them to be in agreement.

In connection with performing the procedure described in the preceding paragraph, nothing came to our attention which caused us to believe that the amounts identified above should be adjusted.

*Ernst & Whinney*

Philadelphia, Pennsylvania  
March 25, 1986

**BETZ**

LABORATORIES, INC.

THE WATER AND ENERGY  
MANAGEMENT COMPANY

SOMERTON ROAD • TREVOSE, PENNSYLVANIA 19047 • U.S.A. / TELEPHONE 215 • 355-3300 • TELEX 84-5159

March 25, 1986

Regional Administrator  
U.S. Environmental Protection Agency  
Region V  
230 S. Dearborn Street  
Chicago, IL 60604

RECEIVED

APR 1 1986

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGIONAL OFFICE  
CHICAGO, ILLINOIS

Dear Sir:

In compliance with Federal Regulations outlined in 40 CFR Parts 264 and 265, and/or the equivalent State regulations, we hereby submit the following letter(s) in support of our use of the financial test for liability coverage and closure care for the following Betz Laboratory facility(ies) under your jurisdiction:

Betz Laboratories, Inc.  
2118 Reiser Avenue, S.E.  
New Philadelphia, OH 44663  
EPA ID # OHD 070751268

Separate letters have been enclosed (for your files) for each facility listed above.

This submission supercedes any previous letter(s) demonstrating financial assurance of closure care or liability.

Please direct any questions relating to the above matter to Roy Manley, Regulatory Affairs Group, (215) 355-3300.

Sincerely,

BETZ LABORATORIES, INC.

*Roy Manley*

Roy Manley  
Regulatory Affairs Specialist

kaw/82  
Enclosures

August 13, 1985

RECEIVED

AUG 21 1985

SOLID WASTE BRANCH  
U.S. EPA, REGION V

US EPA Region #5  
230 S. Dearborn  
Chicago, IL 60602

RECEIVED  
THE HARTFORD



AUG 22 1985  
Philadelphia Regional Office  
1 Voorhees Executive Mall  
1201 White Horse Road  
P. O. Box 87  
Somerville, New Jersey 08083  
Telephone: (609) 627-9400  
SWD - AIS  
U.S. EPA, REGION V

CERTIFIED MAIL, RETURN  
RECEIPT REQUIRED

P 381 019 174

Re: Named Insured: Betz Laboratories, Inc., Etal  
33 S. Lombard Rd.  
Addison, IL 60101  
Policy #: 39 C MA6080E  
Certificate Termination (Our Endt. L-4492-0): 7/1/85  
EPA-ID: ILD00922281  
722

Gentlemen:

This letter is to give written notice that the captioned policy and endorsement have expired 7/1/85 and were renewed without pollution coverage. We have been informed that the American International Group (AIG) has written pollution coverage for this insured effective 7/1/85. We expect that by now you have received AIG's certification of coverage to such effect.

In any case, our certificate is hereby terminated as per Part II 1.(e) of our endorsement L-4492-0 and 40 CFR 264.151(i).

Sincerely,

*Joanne Cunningham*  
Joanne Cunningham  
Senior Casualty Underwriter

jgs

*AL-H STATE*  
*IL 009 722 281*

**BETZ**<sup>®</sup>

LABORATORIES, INC.

SOMERTON ROAD • TREVOSE, PENNSYLVANIA 19047 • U.S.A. / TELEPHONE: 215 • 355-3300 • TELEX: 84-5159

March 21, 1983

U. S. EPA  
Region V  
230 S. Dearborn Street  
Chicago, IL 60604

Dear Sir:

I am a chief financial officer (treasurer) of Betz Laboratories, Inc., 4636 Somerton Road, Trevose, PA 19047. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

Betz Laboratories, Inc.  
33 S. Lombard Road  
Addison, IL 60106  
EPA ID # ILD 009722281  
Closure Cost Estimate: \$10,780

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: (NOT APPLICABLE).
3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: (NOT APPLICABLE).

RECEIVED  
WASTE MANAGEMENT  
BRANCH

March 21, 1983

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: (NOT APPLICABLE).

This firm "is required" to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on 12/31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended 1981.

ALTERNATIVE 1

1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above).	\$ 10,780
*2. Total liabilities (if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4).	38,851,090
*3. Tangible net worth	126,798,542
*4. Net worth	126,798,542
*5. Current assets	88,436,800
*6. Current liabilities	30,939,186
7. Net working capital (line 5 minus line 6)	57,497,614
*8. The sum of net income plus depreciation, depletion, and amortization	35,383,043

March 21, 1983

- \*9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)

138,702,398 (84%)

	YES	NO
10. Is line 3 at least \$10 million?	X	
11. Is line 3 at least 6 times line 1?	X	
12. Is line 7 at least 6 times line 1?	X	
*13. Are at least 90% of firm's assets located in the U.S.? If not, complete line 14.		X
14. Is line 9 at least 6 times line 1?	X	
15. Is line 2 divided by line 4 less than 2.0?	X	
16. Is line 8 divided by line 2 greater than 0.1?	X	
17. Is line 5 divided by line 6 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Very truly yours,

BETZ LABORATORIES, INC.



Richard A. Heal  
Treasurer

March 21, 1983





217/782-6761

Refer to: 0430050007 -- DuPage County  
Betz Laboratories Inc.  
ILD00972281  
RCRA - Permits

Attn: Environmental Coordinator  
or Plant Manager

May 6, 1988

Betz Laboratories, Inc.  
333 South Lombard Road  
Addison, IL 60101

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart D. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart B. For your convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.



Page 2

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to \$25,000 per day of noncompliance.



Page 3

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
P.O. Box 19276  
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence M. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LHE:JKM:mab/1203j/1204j/

Enclosures

cc: Division File  
Compliance  
Maywood Region  
USPEA Region V



# Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153 753

312/345-9780

Refer to: 04300507 - DuPage County - Addison/Betz Laboratories, Inc.  
ILD009722281

May 7, 1982

Betz Laboratories, Inc.  
333 S. Lombard Road  
Addison, Illinois 60101

Betz Laboratories, Inc.  
4636 Somerton Road  
Trevose, Pa. 19047

Attn: Ernest Trippi

Attn: J.R. Marquiss

Dear Mr. Trippi:

On March 17, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of Betz Laboratories in Addison, Illinois. This inspection was conducted by the Illinois Environmental Protection Agency under a Cooperative Arrangement with, and authorization of, the United States Environmental Protection Agency (USEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) of 1976, P.L. 94-580, as amended. During the inspection the following deficiencies were observed:

Pursuant to 40 CFR 265.13(b), the owner/operator must have on file at the facility a detailed written waste analysis system describing the procedures to be used to compile data required under 40 CFR 265.13(a). The owner/operator is deficient in that no such plan was present at the site on the date of the inspection.

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to 40 CFR Part 265 Subpart D. Your facility is deficient in that the contingency plan available at the time of the inspection did not contain all of the requirements mentioned above.

Pursuant to 40 CFR 265.73 the owner/operator must keep a written operating record at the facility. The operating record must include the following:

- 1) A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I.
- 2) The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers.
- 3) Records and results of waste analyses and trial tests.
- 4) Summary reports and details of all incidents that require implementation of the contingency plan.
- 5) Records and results of inspections.
- 6) Monitoring and testing data.
- 7) All closure cost estimates and for disposal facilities all post-closure cost estimates.

Your facility is deficient in that the operating record available at the time of the inspection did not contain the information listed in 1, 2, and 6 of the requirements listed above.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the above deficiencies. Failure to correct these deficiencies may result in enforcement actions initiated by USEPA pursuant to 40 USC 6928. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Craig J. Liska of my staff at the above number.

Sincerely,

*Kenneth P. Bechely (SR)*

Kenneth P. Bechely, Northern Region Manager  
Field Operations Section  
Division of Land Pollution Control

KPB:CJL:prb

Enclosure: Inspection Report

cc: Division File  
Northern Region  
U.S. E.P.A. - Region V ✓

(18)

Region # 2

Date 03/17/82

(20) \_\_\_\_\_ (25)

Letter Sent (Yes or No)

(26)

Weather *Birth seven ~ 50*

Inspector C J L

(27)
(29)

Site Open: Yes( ☒ ) No( ☐ )

AUTHORIZATION:

E.P.A. Permit ( )

Variance ( )

21(e) ( )

Board Order ( )

Illegal (5) ( ) *N/A*

(31)

LPC 4 1/79 5,000

I S or D

(62)

GENERAL REMARKS:

GENERAL REMARKS: This facility is involved in the processing and selling of water treatment and industrial process inorganic chemicals. The finished product is used by industries who use boilers, cooling towers, paper manufacturing machines and other industries. The product is manufactured solely by mixing various chemicals. A hazardous waste is generated when each mixing tank is cleaned. The waste is directed into underground channels where it is poured into the waste tank. The waste is considered hazardous.

INTERVIEW:

INTERVIEW: due to the high levels of chromium. The waste is hauled off-site two or three times a month. This facility qualifies only as a generator, however. Ernie Tiippi stated that he would like to be considered as a storage facility for reasons being that there may be a problem removing the waste before 90 days pass. Ernie does not expect a problem, but he would rather not take the risk. The following deficiencies were noted during the inspection: no waste analysis plan, sampling plan, ha:

DIAGRAM:

insufficient information and counting record is only partially complete. In general, the facility appeared well maintained. The building was well organized and very clean. Eric stated that he would start working on correcting the above mentioned deficiencies.

04300507  
STATE IDENTIFICATION NUMBER  
(If Applicable)

ILD0097222P  
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Betz Laboratories, Inc.  
(B) Street: 333 S. Lombard Road  
(C) City: Addison (D) State: IL (E) Zip Code: 60101  
(F) Phone: (312) 543-8480 (G) County: DuPage  
(H) Operator: Same  
(I) Street: \_\_\_\_\_  
(J) City: \_\_\_\_\_ (K) State: \_\_\_\_\_ (L) Zip Code: \_\_\_\_\_  
(M) Phone: \_\_\_\_\_ (N) County: \_\_\_\_\_  
(O) Owner: Betz Laboratories, Inc.  
(P) Street: 4636 Sanerton Road  
(Q) City: Trevose (R) State: Pa. (S) Zip Code: 19047  
(T) Phone: (215) 355-3300 (U) County: \_\_\_\_\_  
(V) Date of Inspection: 3-17-82 (W) Time of Inspection (From) 1:30 p (To) 3:45 p  
(X) Weather Conditions: Partly sunny ≈ 50°

*Non-applicable information  
contained on pages 12 thru 18 have been omitted.*

(Y) Person(s) Interviewed Title Telephone  
Ernie Trippi Plant Mgr. (312) 543-8480

(Z) Inspection Participants Agency/Title Telephone  
Craig J. Liska EPA/EPS I (312) 345-9780

(AA) Preparer Information  
Name Craig J. Liska Agency/Title EPA/EPS I Telephone (312) 345-9780

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- ☒ A. Storage and/or Treatment  
1. Containers (I)  
② Tanks (J)  
3. Surface Impoundments (K)  
4. Waste Piles (L)

☐ B. Land Treatment (M)

☐ C. Landfills (N)

☐ D. Incineration and/or Thermal Treatment  
(O and P)

☐ E. Chemical, Physical, and Biological  
Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:  
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	<u>N/A</u>	_____
2. Facility expansion?	—	—	<u>N/A</u>	_____
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>✓</u>	—	—	_____
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	<u>✓</u>	—	_____
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	<u>N/A</u>	_____
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	—	<u>✓</u>	—	<u>Facility has controlled entry</u>
2. Artificial or natural barrier around facility?	<u>✓</u>	—	—	<u>and fence around tank area.</u>
3. Controlled entry?	<u>✓</u>	—	—	_____
4. Danger sign(s) at entrance?	<u>✓</u>	—	—	_____
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<u>✓</u>	—	—	_____
2. Records of operator error?	<u>✓</u>	—	—	_____
3. Records of discharges?	<u>✓</u>	—	—	_____

\*Not Inspected

GENERAL FACILITY STANDARDS      Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2. No smoking signs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3. Separation and protection from ignition sources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

\*Not Inspected

IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation  
of Facility:

Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

Yes   No   NI\*   Remarks

—   ✓   —

\_\_\_\_\_

(B) If required, does the facility  
have the following equipment:

1. Internal communications or  
alarm systems?

✓   —   —

ADT \_\_\_\_\_

2. Telephone or 2-way radios  
at the scene of operations?

✓   —   —

\_\_\_\_\_

3. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

✓   —   —

\_\_\_\_\_

Indicate the volume of water and/or foam available for fire control:

\_\_\_\_\_  
\_\_\_\_\_

(C) Testing and Maintenance of  
Emergency Equipment:

1. Has the owner or operator  
established testing and  
maintenance procedures  
for emergency equipment?

✓   —   —

\_\_\_\_\_

2. Is emergency equipment  
maintained in operable  
conditions?

✓   —   —

\_\_\_\_\_

(D) Has owner or operator provided  
immediate access to internal  
alarms? (if needed)

✓   —   —

\_\_\_\_\_

\*Not Inspected

(E) Is there adequate aisle space for unobstructed movement?

✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI\* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

*plan has insufficient information*

✓

✓

✓

✓

# V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>n/a not needed yet</i>

## VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2. Are records of past shipments retained for 3 years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

\*Not Inspected

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

— ✓ —

*operating record is  
partially complete*

2. Does the operating record contain the following information:

- \*\*b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

— ✓ —

- c. The location and quantity of each hazardous waste within the facility?

— ✓ —

- \*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — *N/A*

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

— ✓ —

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

— — *N/A*

*not needed yet*

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓ — —

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
<b>(A) Closure and Post Closure</b>				
1. Is the facility closure plan available for inspection by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Is closure estimate available by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>(B) Post closure care and use of property</b>				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

VIII. FACILITY STANDARDS  
(Part 265, Subparts I thru R)

**I  
USE AND MANAGEMENT OF CONTAINERS**

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>waste only in tanks</u>
2. Are containers compatible with waste in them?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3. Are containers stored closed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. Are containers managed to prevent leaks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	<u>N/A</u>	-----
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	<u>N/A</u>	-----

J  
TANKS

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓	---	---	-----
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	---	---	<u>N/A</u>	<u>covered tank</u>
3. Do continuous feed systems have a waste-feed cutoff?	---	---	<u>N/A</u>	<u>no continuous feed</u>
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	<u>N/A</u>	-----
5. Are required daily and weekly inspections done?	✓	---	---	-----
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	<u>N/A</u>	<u>wastes are compatible</u>
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	<u>N/A</u>	<u>" are not ignitable or reactive</u>

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: 10,000 gallons

Tank diameter: ~10 feet

Distance of tank from property line ~129 feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K  
SURFACE IMPOUNDMENTS

Facility Name: \_\_\_\_\_

Date of Inspection: \_\_\_\_\_

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

N/A

2. Do earthen dikes have protective covers?

\_\_\_\_\_

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

\_\_\_\_\_

4. Is the freeboard level inspected at least daily?

\_\_\_\_\_

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

\_\_\_\_\_

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

\_\_\_\_\_

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

\_\_\_\_\_

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	—	—	N/A	—
4. Are inspection procedures followed according to 265.403?	—	—		—
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—		—
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	—	—		—

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

#### IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

#### 1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	✓	—	—	—
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	✓	—	—	—
2. Name, mailing address, telephone number, and EPA ID Number of Generator	✓	—	—	—

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>	<u>not needed yet</u>

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>	<u>waste stored in tank</u>
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

### 3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	—	—	N/A	
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	—	—		
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	—	—		
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	—	—		
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	—	—		
c. Do continuous feed systems have a waste-feed cutoff?	—	—		
d. Are required daily and weekly inspections done?	—	—		
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	—	—		
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	—	—		

VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>	<u>not needed yet</u>

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
--	--------------------------	-------------------------------------	--------------------------	--

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>	
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Met the Manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

X  
TRANSPORTER REQUIREMENTS  
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING  
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	—	—	N/A	

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	—	—	N/A	
B. Are signed completed manifest(s) on file?	—	—	—	

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	—	—	N/A	
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	—	—		

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

\*Not Inspected

## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

This facility is involved in the processing and selling of water treatment and industrial process improvement chemicals. The facility's hazardous waste stream is generated when their process mixing tanks are cleaned. The waste is stored in an outdoor, above ground tank. The waste is considered a hazardous waste (D002) due to the level of chromium found in the liquid. A hauler removes the waste from the site approximately 2 or 3 times per month. Although this facility qualifies only as a generator, Mr. Trippi expressed a desire to retain his storage facility status. The following deficiencies were observed during the inspection: no waste analysis plan, contingency plan has insufficient information and the operating record is only partially complete.

**D. Corrective  
Action**

HRE-8J

FEB 24 1992

Mr. Ernest M. Trippi  
Plant Manager  
Betz Laboratories, Inc.  
333 South Lombard Road  
Addison, Illinois 60101-3087

Re: Betz Laboratories, Inc.  
ILD 099 722 281

Dear Mr. Trippi:

Per your request of February 14, 1992, enclosed please find a copy of the Preliminary Assessment/Visual Site Inspection for the referenced facility.

The executive summary and conclusions and recommendations section have been withheld as enforcement confidential.

If you have any questions, please contact me at (312) 886-4448.

Sincerely yours,

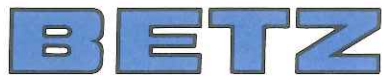
Kevin M. Pierard, Chief  
Minnesota/Ohio Technical Enforcement Section  
RCRA Enforcement Branch

Enclosure

HRE-8J:FHARRIS:6-2884:2/20/92:MASTER

OFFICIAL FILE COPY

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
	<i>SK</i> <i>2/24/92</i>	<i>JP</i> <i>2/24/92</i>	



LABORATORIES, INC.

SOMERTON ROAD • TREVOSE, PENNSYLVANIA 19047 • U.S.A. / TELEPHONE: 215 • 355-3300 • TELEX: 173 148  
ADDISON PLANT: 333 SOUTH LOMBARD ROAD • ADDISON, ILLINOIS 60101 • TELEPHONE: 312 • 543-8480

FEB 18 1992

February 14, 1992

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

United States  
Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Attn: Kevin Pierard, HRE-8J

Dear Mr. Pierard:

On April 2, 1991, Resource Applications, Inc. conducted a Preliminary Assessment and Visual Site Inspection of our facility for U.S. EPA. The inspection was performed by Amy Sapp and Michael Gorman, Environmental Scientists for RA, Inc.

I understand that a final report has been drafted and am therefore requesting that a copy be forwarded to me at your earliest convenience. I have enclosed one of my business cards for your reference. Thank you for your cooperation.

Sincerely,

Ernest M. Trippi  
Plant Manager

EMT:cs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

RECEIVED APR 08 1993  
WMD RCRA  
RECORD CENTER *Comp*

REPLY TO ATTENTION OF:

5HR-12

March 20, 1991

Mr. Earnest Trippe  
Plant Manager  
Betz Laboratories, Inc.  
333 S. Lombard Road  
Addison, IL 60101

Re: Visual Site Inspection  
Betz Laboratories, Inc.  
ILD 009 722 281

Dear Mr. Trippe:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.

The VSI has been scheduled for April 2, 1991. The inspection team will consist of Amy Sapp and William Dytrych of Resource Applications, Inc. and Jerry McLane, PRC Environmental Management, Inc., contractors for the U.S. EPA.

Representatives of the Illinois Environmental Protection Agency may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Enclosed is a summary of our current knowledge and data gaps.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion may be made available upon request.

Sincerely yours,

*Sheri L. Bianchin*  
for Kevin M. Pierard, Chief  
OH/MN Technical Enforcement Section

Enclosure

cc: Lorraine Morris, IEPA - Maywood  
Larry Eastep, IEPA - Land Pollution Control Division

ATTACHMENT

Betz Laboratories, Inc.  
333 S. Lombard Road  
Addison, Illinois 60101

PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUs)

1. Hazardous Waste Storage Tank - A 10,000 gallon hazardous waste storage tank is used to store rinse water generated by tank cleaning and classified by RCRA waste code D007.
2. Underground Pipeline - A pipeline is used to transport waste generated in mixing tanks to the hazardous waste storage tank.
3. Satellite Accumulation Area - Paint solvent is collected in a 55-gallon drum on site.
4. Solvent Rinse Accumulation Area - Solvent rinse generated by tank cleaning is accumulated in a 300 gallon tote. This waste is classified by RCRA waste code D001.

From the list of probable SWMUs please address the following questions:

- Do the above SWMUs still exist at the facility and are they in operation?
  - What are the start-up and closure dates of the above SWMUs?
  - What types of wastes are the SWMUs currently/formerly used for?
  - Name any SWMUs at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste.
2. Please supply as much information as possible concerning the site history. This would include any information you have regarding or any other owner/operators at this location.
  3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.
  4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

If available, the following items are requested:

- A detailed map of the facility showing the location of the SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.



**U.S. Environmental Protection Agency**  
Office of Waste Programs Enforcement  
Contract No. 68-W9-0006



# **TES 9**

**Technical Enforcement Support  
at Hazardous Waste Sites  
Zone III  
Regions 5,6, and 7**



**PRC Environmental Management, Inc.**

PRC Environmental Management, Inc.  
233 North Michigan Avenue  
Suite 1621  
Chicago, IL 60601  
312-856-8700  
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/  
VISUAL SITE INSPECTION**

**BETZ LABORATORIES, INC.**

**RELEASED ADDISON, ILLINOIS**

**DATE**

**RIN #** 00173-00 **ILD 009 722 281**

**INITIALS** RLX **FINAL REPORT**

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 009 722 281
Date Prepared	:	February 6, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087-IL 31
Prepared by	:	Resource Applications, Inc.
RAI Project Manager	:	Virginia Sorrells
Principal Investigator	:	Michael W. Gorman
Telephone No.	:	(312) 332-2230
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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#### Attachment

- A - EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B - VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C - VISUAL SITE INSPECTION FIELD NOTES
- D - PROCESS FLOW DIAGRAM
- E - SAMPLING RESULTS
- F - CHEMICALLY-RESISTANT COATING SPECIFICATIONS
- G - DIAGRAM OF HAZARDOUS WASTE STORAGE TANK

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RELEASED

DATE

RIN # 0017300

INITIALS MK

EXECUTIVE SUMMARY

~~ENFORCEMENT  
CONFIDENTIAL~~

Resource Applications, Inc. (RAI), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMUs) and other areas of concern (AOCs) at the Betz Laboratories, Inc. (Betz) facility in Addison, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities.

The Betz facility is engaged in chemical blending in the production of water treatment chemicals. These chemicals are used for boiler and cooling tower treatment in the paper mill, petroleum, hydrocarbon and steel industries. The facility currently covers about 4.5 acres. Operations at Betz began in July 1967. The facility currently generates approximately 15,000 gallons of hazardous waste every month. This waste is generated through the cleaning of tanks used to mix raw materials in the process of producing blended chemicals. The facility's Part A Permit was withdrawn in 1988, but the withdrawal has not yet been approved by the Illinois Environmental Protection Agency (IEPA). The facility currently stores hazardous waste and is regulated as a treatment, storage, or disposal (TSD) facility.

The PA/VSI identified the following 6 SWMUs and 2 AOCs at the facility:

Solid Waste Management Units

1. Scrubbers
2. Main Production Area
3. Explosion Proof Room (E.P. Room)
4. Truck Loading Room
5. Incinerator
6. Hazardous Waste Storage Tank

Areas of Concern

1. Tote Cleaning Area
2. Heavy Aromatic Naphtha Underground Storage Tank

The potential for a release to the ground water from this facility is low. SWMUs that manage hazardous wastes or hazardous materials are sound. Addison, Illinois obtains drinking water from wells

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DATE \_\_\_\_\_  
RIN # 00173-66  
INITIALS MP

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drilled into the shallow bedrock aquifer system. The nearest pumping station is approximately 0.5 mile east of and down gradient from the facility. The presence of large amounts of clay in the soil minimizes the likelihood that contamination would migrate from the glacial drift aquifer system into the shallow bedrock aquifer system. The potential for contamination entering the drinking water supply is low.

The potential for release of hazardous constituents to surface waters is low. Betz employees would be able to contain a spill before it had the opportunity to reach surface water. The nearest surface water is an intermittent stream 0.25 mile from the facility.

Air scrubbers limit the possibility of a release via the air route. Hazardous wastes are stored in a closed tank and the incinerator is regulated by an Illinois EPA Air Permit.

No facility soil contamination has been identified and waste management practices are sound, so the potential for a release to on-site soils is minimal.

The Betz facility is surrounded by a chain link fence to restrict public access. Internally, the facility has an ADT Security System.

This facility poses a low threat of release via migration pathways. Proper waste management practices, with the following exceptions, limit the possibility of future release. Incinerator ash (from SWMU No. 5) is managed as non-hazardous waste, although it has not been analyzed. The floor of the truck loading room (SWMU No. 4) has cracks and chips in it which could allow for soil or ground water contamination in the event of a spill incident. The capacity of the secondary containment for the Hazardous Waste Storage Area (SWMU No. 6) is insufficient. RAI recommends analyzing the incinerator ash for hazardous waste characteristics, repair the cracks in the flooring to prevent potential soil or ground water contamination, and increase the capacity of the secondary containment to accommodate the entire capacity of the storage tank.

## 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the Betz Laboratories, Inc. site (Betz).

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC). The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm operational, SWMU, AOC, and release information obtained during the PA.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Betz Laboratories, Inc. (Betz) facility in Addison, Illinois (ILD 009 722 281).

The PA was completed on March 19, 1991. RAI gathered and reviewed information from Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files.

The VSI was conducted on April 2, 1991. It included interviews with Betz's Plant Manager and a walk-through inspection of the facility. Seven SWMUs and two AOCs were identified at the facility. A completed EPA Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A. The VSI is summarized and 19 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

## **2.0 FACILITY DESCRIPTION**

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

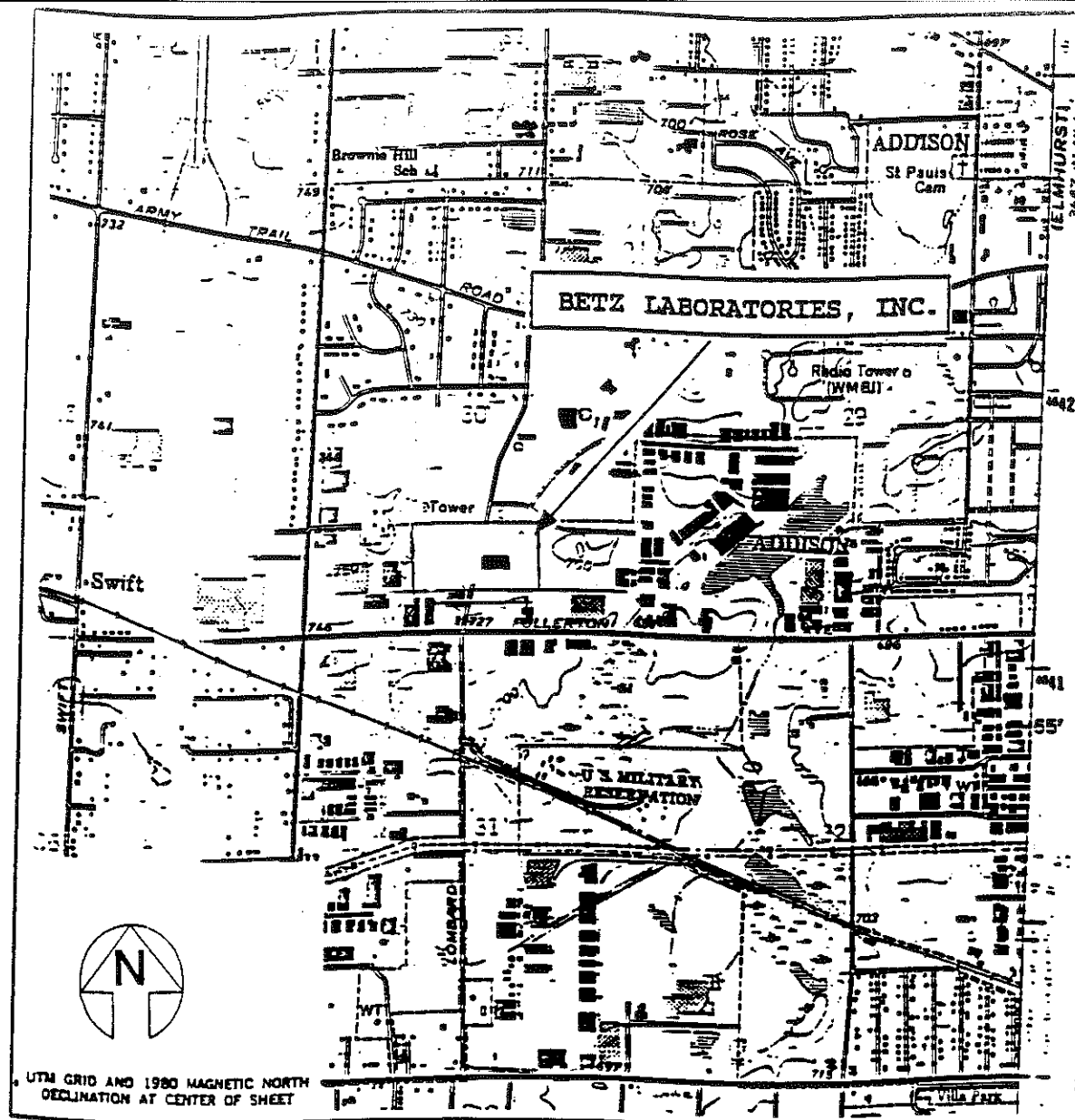
### **2.1 FACILITY LOCATION**

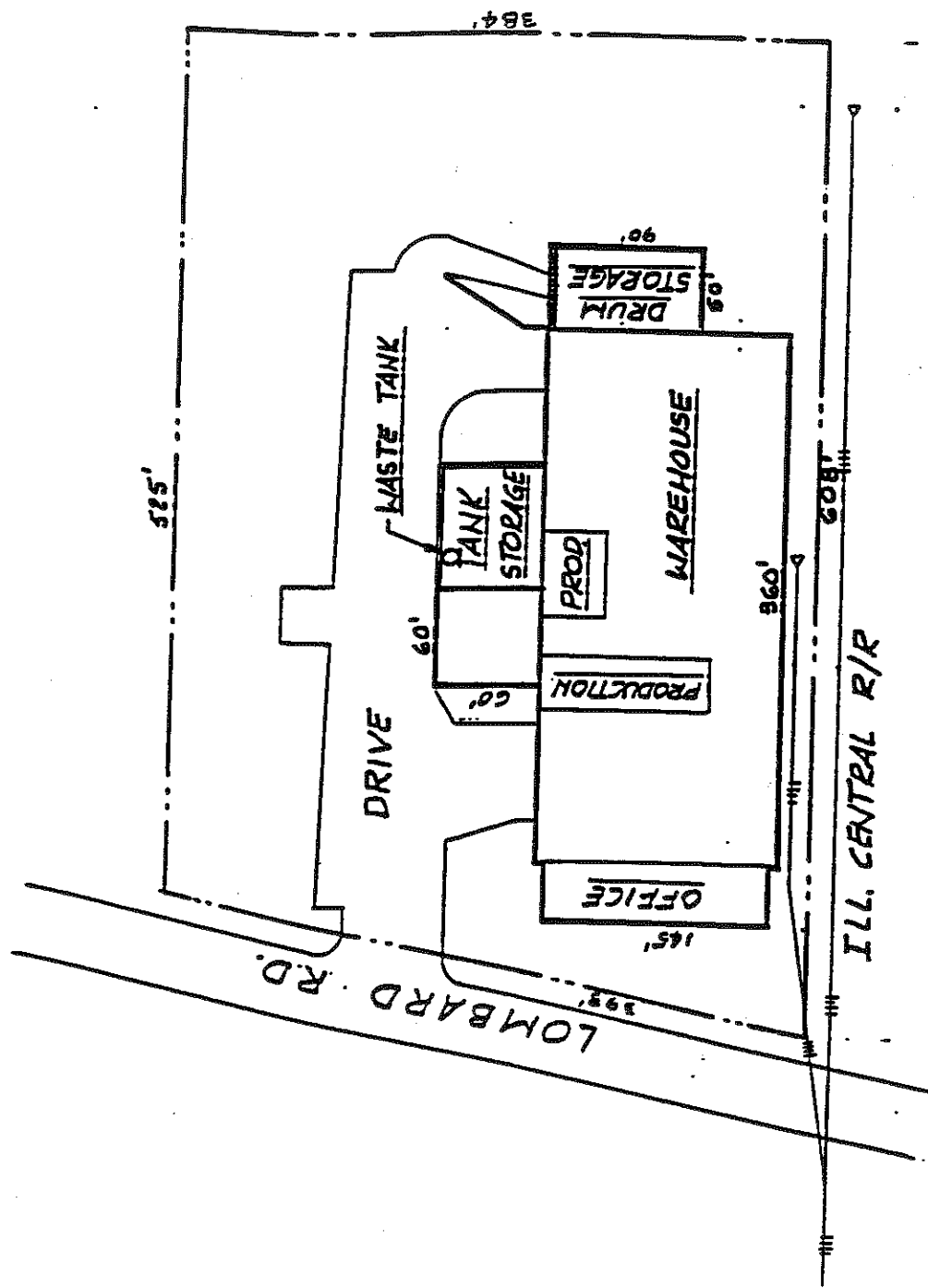
The Betz facility is located in Addison, Illinois in DuPage County, approximately 19 miles west of downtown Chicago (latitude 41° 55' 14", longitude 88° 1' 25"). Figure 1 shows the facility's location. Betz is located in an industrial area on Lombard Road and occupies approximately 4.5 acres. Figure 2 shows the general layout of the facility.

### **2.2 FACILITY OPERATIONS**

The Betz facility is engaged in chemical blending in the production of water treatment chemicals. These chemicals are used for boiler and cooling tower treatment and in the paper mill, petroleum, hydrocarbon, and steel industries. The facility currently employs 20 people. Operations at Betz have been the same since the facility opened in July 1967. Product lines change frequently but the Plant Manager, Earnest Trippi, did not provide specific information concerning product lines. Raw materials are delivered to the facility in drums, 300 or 400-gallon portable totes, paper bags, and in bulk. These materials are stored in a warehouse, an outdoor drum storage area, or an outdoor tank farm. Once Betz receives an order for a product, the raw materials are distributed to the production areas. In most cases, water is then discharged into a mixing tank and the chemicals added and blended. In order to mix the chemicals it is sometimes necessary to heat or cool the mixture. This is accomplished using boiler steam or cold water circulated through a system of pipes. Quality assurance checks are made by lab tests which are conducted on-site. Products are shipped within five days of production.

The Betz facility is owned by Betz Laboratories, Inc., with corporate headquarters in Trevose, Pennsylvania. Hazardous waste is generated by cleaning the mixing tanks. Rinse water and solvent rinse is often reused in subsequent batches but is generally flushed to various trench systems and pumped via overhead piping to a hazardous waste storage tank. The waste is then shipped to Clean Harbors Inc. of Chicago, Illinois for treatment. Table 1 lists the SWMUs located at the Betz facility.






Betz Laboratories, Inc. Addison, Illinois
<b>Figure 2</b> Facility Layout
Scale: 1 INCH = 100 FEET Source: Betz, 1991
 Resource Applications, Inc.

TABLE 1  
SOLID WASTE MANAGEMENT UNITS (SWMUs)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Scrubbers	No	Active
2	Main Production Area	No	Active
3	E.P. Room	No	Active
4	Truck Loading Room	No	Active
5	Incinerator	No	Active
6	Hazardous Waste Storage Tank	Yes**	Active; less than 90-day storage

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Note:

\* A RCRA hazardous waste management unit is one that currently requires a RCRA permit.

\*\* IEPA has not yet acted on Betz's Part A Withdrawal Request Form.

In January 1991, Betz hired OHM Corporation to remove a 20,000-gallon underground fuel storage tank. The tank removal occurred between January 7 and January 11. Soil samples from the area around the tank did not reveal any soil contamination. The tank was drained of a liquid, which was determined to be soiled water. After the tank was removed, the area was backfilled with limestone and resurfaced (OHM, 1991).

## **2.3 WASTE GENERATING PROCESSES**

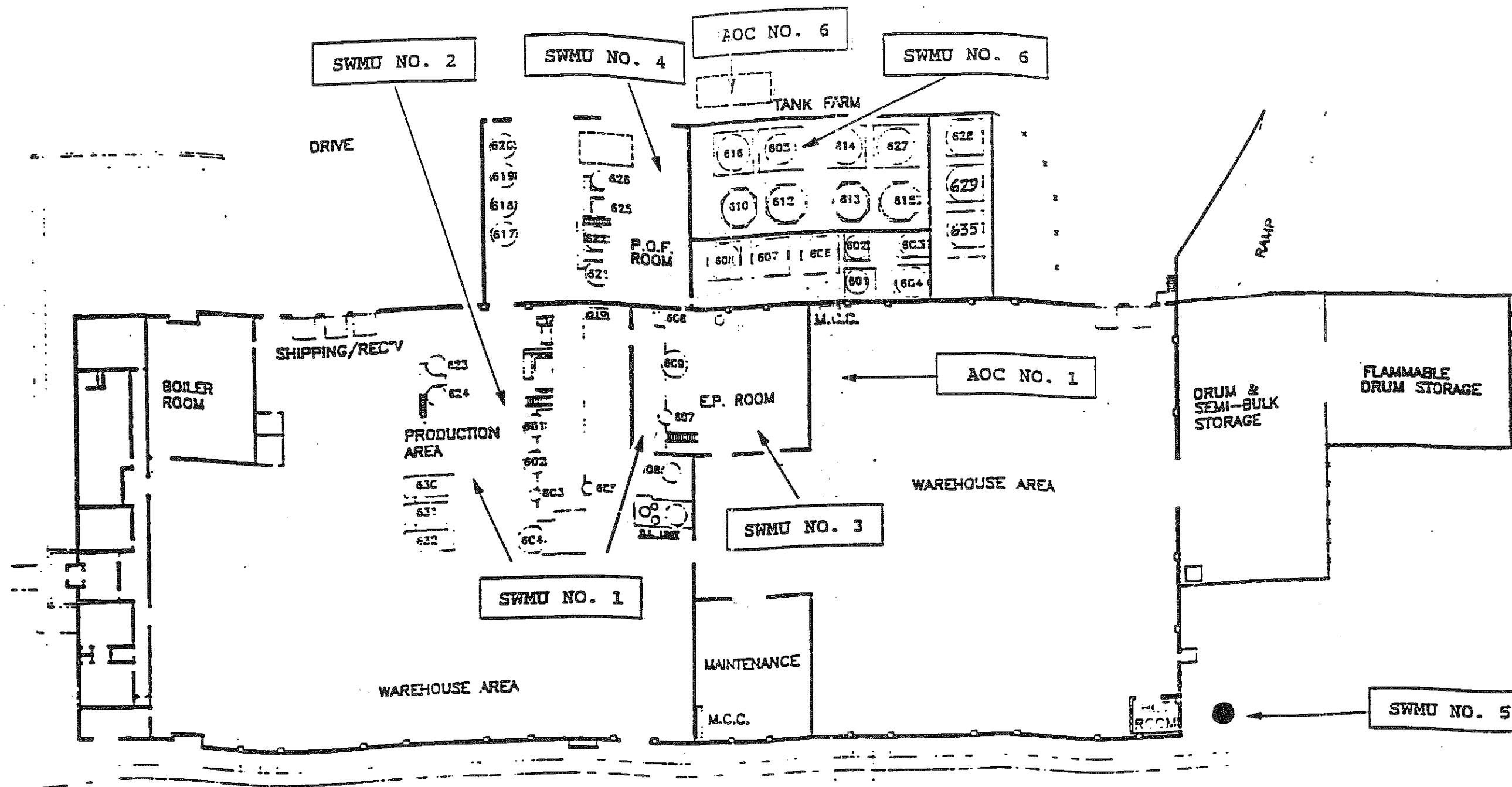
The primary waste streams generated at the Betz facility are rinse water (D007) generated from cleaning the mixing tanks, and solvent rinse (aromatic naphtha) used for cleaning mixing tanks if the product in the tank is oil-based. Attachment D is a process flow diagram of the processes used and wastes generated at Betz. These wastes are generated in two areas within the facility, the Main Production Area (SWMU No. 2) and the Explosion Proof Room (E.P. Room) (SWMU No. 3), where there are mixing tanks. Figure 3 shows the location of SWMUs and AOCs at Betz.

Small amounts of wastes are generated through lab tests. These wastes are handled in the same manner as the rinsate wastes. Rinsate generated in cleaning the portable totes is also handled in this manner. The total volume of wastes generated at Betz is 15,000 gallons each month, but, due to the nature of waste collection and storage, waste volume generated through each process is unknown.

The Betz facility plans to discontinue the use of chromium at the facility by June 1991, eliminating the D007 waste from the waste streams generated at the facility. Plans are also being developed to install a tank to recycle the solvent rinse used for cleaning mixing tanks if the tanker trucks contained an oil-based product.


## **2.4 RELEASE HISTORY**

No spill reports have been submitted to EPA. The only documentation that a release has occurred at the site is a notation in an IEPA inspection report dated November 3, 1987, "Spill occurred in 1979, plan was implemented, waste was contained on-site. No problems." (IEPA, 1987). The Plant Manager at Betz, Earnest Trippi, informed RAI during the VSI that while loading a truck in the P.O.F. Room (SWMU No. 4), a coupling had broken loose and that five to ten gallons of petromeen, an oil-based product produced by Betz, had spilled onto gravel. Oil absorbent material was spread over the spill and all material, including the affected gravel, was put into barrels and disposed of. No evidence of this release was visible during the VSI.



PRELIMINARY



Betz Laboratories, Inc. Addison, Illinois	
<b>Figure 3</b> SWMU and AOC Location Map	
Scale: 1 INCH = 40 FEET Source: Betz, 1991	
	Resource Applications, Inc.



Betz submitted a Notification of Hazardous Waste Activity to IEPA as a hazardous waste generator and TSD facility on August 12, 1980. On November 14, 1980, EPA received a Part A application for a Hazardous Waste Permit for the facility. This covered 15,000 gallons of container storage (S01), 10,000 gallons of tank storage (S02), and 10,000 gallons of treatment tank capacity (T01). In the initial Part A, the T01 tank was incorrectly put on the permit application. Betz has never treated hazardous waste, so the process code should have been S01. The facility was granted interim status on May 29, 1982. Waste streams currently managed by Betz are listed in Table 2.

In response to a letter requesting the submittal of a Part B permit application, the facility submitted a Part A Withdrawal Request Form on November 4, 1988. Betz contended that the Part A application for a Hazardous Waste Permit was filed as a protective measure, and that the facility does not store hazardous waste on-site longer than 90 days and, therefore, should be regulated as a generator. According to Lorraine Morris, the IEPA inspector for the facility, no action has yet been taken by IEPA on the withdrawal request (Morris, 1991).

RCRA inspections conducted between 1982 and 1990 revealed a variety of minor violations. An IEPA inspection of the facility on March 17, 1982 resulted in a Warning Letter for minor violations which the facility corrected (IEPA, 1982). An IEPA inspection on October 14, 1987 resulted in an informal request by the Agency that Betz correct a violation of the State of Illinois Environmental Protection Act Title 35, Subtitle G, Chapter 1, Section 725.115 requiring that the owner or operator of a hazardous waste facility conduct regular inspections of the facility to prevent or identify a release of hazardous waste to the environment or a threat to human health. The facility addressed this violation and returned to compliance on October 26, 1987 (IEPA, 1987). An IEPA inspection on August 28, 1990 identified no violations. The facility is currently in compliance and is regulated as a TSD facility.

Facility air permits 79050030 and 88030090 allow discharge from its incinerator and various mixing vessels and storage tanks. Emissions of organic material and particulates are not to exceed 7.0 and 0.7 tons per year, respectively. An IEPA inspection on October 6, 1987 observed that two air scrubbers were operating at the facility, and that they were not covered by an operating permit. This violation was corrected in 1987 when Betz's application for an air permit was approved.

The facility does not have a National Pollutant Discharge Elimination System (NPDES) permit. According to the Plant Manager, Earnest Trippi, Betz may apply for one in the future. Currently, storm drain water and non-contact cooling water is flushed to the sanitary sewer system.

**TABLE 2**  
**SOLID WASTES**

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Primary Management Unit*</u>
Rinse water/D007	Mixing tanks Tanker trucks Portable totes	SWMU Nos. 2, 3, 4, 6
Solvent rinse/D007	Mixing tanks Tanker trucks Portable totes	SWMU Nos. 2, 3, 4, 6
Incinerator Ash/ Unclassified	Incinerator	SWMU No. 5

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Note:

\* Primary management unit refers to a SWMU that currently manages the waste.

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## 2.6

## ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Betz facility.

### 2.6.1

#### Climate

Addison, Illinois is located in northeast DuPage County, approximately six miles southwest of O'Hare International Airport, the location of a National Weather Service office. With no significant topographical barriers to air flow, the climate in the area is typically continental with cold winters, warm summers, and frequent short-period fluctuations in temperature, humidity, cloudiness and wind direction (Ruffner, 1985). The average daily temperature is 49.2°F. The lowest average daily minimum temperature of 12.4°F occurs in January. The highest average daily maximum temperature is 83.3°F in July. The prevailing wind direction is west-southwest, and the average wind speed is 10 miles per hour. Average annual precipitation, as water equivalent, is 33.34 inches. In winter, about one-half of the precipitation (10 percent of the annual total) falls as snow. During the fall, winter and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas in the summer, rainfall is often locally heavy and variable. The 1-year, 24-hour maximum rainfall recorded in the area over the last 25 years is 4.6 inches (Ruffner and Bair, 1985).

### 2.6.2

#### Flood Plain and Surface Water

The facility, at an elevation of 720 feet, is located on the eastern side of a local north-south-trending ridge, approximately 0.25 mile north of the headwaters area of an intermittent stream that drains to Salt Creek approximately 2.5 miles to the east. The East Branch of the DuPage River, approximately 1.25 miles west of the site, drains the area to the west of the ridge. Both Salt Creek and the East Branch have a north-south orientation and flow in a southerly direction. Relief along a cross-section line from Salt Creek on the east, through the facility, to the East Branch on the west is low, since elevation changes by no more than 85 feet along the cross-section line's four-mile length (USGS 1981). The Betz site is classified as a Zone C floodplain area, that is an area of minimal flooding outside the 500-year flood limit (U.S. HUD, 1979).

### 2.6.3

#### Geology and Soils

Surface features in the Chicago area are largely the result of glaciation and almost completely cover the underlying bedrock surface (Willman, 1971). The facility is located on the eastern side of a local north-south-trending ridge (USGS, 1980), and is likely underlain by the Urban land-Orthents

complex, clayey soil. The Urban land portion, making up to 75 percent of the complex, designates a radically altered soil that is covered by buildings, parking lots and pavement, precluding identification of the underlying soil. The Orthents, clayey part, which also has likely been altered, normally has a surface layer of silt loam, silty clay loam, or silty clay and a subsoil of silty clay or clay, and slopes generally of one to seven percent. This soil complex is often graded so that water drains to the edges of lots and eventually into the sewer system. Permeability and water capacity vary from location to location as a function of the construction activity the soil complex has seen, although water capacity is generally low to moderate. Runoff is medium to very rapid, depending on the slope (USDA, 1979).

Soils in the Chicago area have developed over the past 13,500 years through the weathering of the immediately underlying glacial deposits left behind, for the most part, by retreating Wisconsin-age glaciers. In the vicinity of the site, the glacial deposits take the form of a gray clayey till, containing pebble - and smaller-sized black shale particles. Approximately 100 feet of till overlie the Silurian-age bedrock. In the Chicago area, formations of Silurian age are almost entirely dolomite, whose composition ranges from extremely argillaceous, silty and cherty to exceptionally pure. In the site locale, it is about 230 feet thick. Beneath the Silurian dolomite are successively older rocks of Ordovician and Cambrian age. Within each of these two systems are distinctive sandstone formations which serve as major aquifers in the Chicago area. The base of the Cambrian is in contact with the crystalline pre-Cambrian basement at inferred depth of 4,000 feet (Willman, 1971).

There are two major bedrock structures in the vicinity of the site -- the Kankakee Arch and the Des Plaines Disturbance. The Chicago area lies on the crest of this broad, gently sloping arch, and bedrock strata underlying the site have a general eastward dip resulting from the eastward plunge of the arch. The Des Plaines Disturbance, as indicated by bedrock well log interpretation, is a roughly circular area about 5-1/2 miles in diameter. While bedrock units within the Des Plaines Disturbance area are intensely faulted, with vertical displacements up to 600 feet, wells drilled into the surrounding Silurian dolomite revealed no faults. However, since the bedrock is buried under 75 feet to 200 feet of glacial drift, there is no indication of the structure of the Des Plaines Disturbance at the surface (Willman, 1971). Consequently, there may be faulting of the bedrock in the site vicinity which has not yet been revealed by well sampling.

#### **2.6.4 Ground Water**

Ground water is obtained from four major aquifer systems in northeastern Illinois -- the glacial drift aquifer system, the shallow bedrock aquifer system, and two deep bedrock aquifer systems. They are distinguished by their hydrologic properties and recharge source areas, and each system has been or is being utilized in the vicinity of the site (Hughes et al., 1966). In northeastern DuPage County, sand

and gravel deposits within the glacial drift that are at least a few feet thick and water-bearing offer excellent possibilities as water sources for domestic and even industrial and municipal water demands (Bergstrom et al., 1955). The shallow bedrock aquifer system in the vicinity of the site comprises the Silurian dolomite bedrock formations underlying the glacial drift. The upper boundary of this aquifer system is the top of the bedrock, and the lower boundary is the top of a sequence of formations of middle-Ordovician age called the Galena-Platteville Dolomite. This shallow bedrock aquifer yields water primarily from fractures and solution openings in the dolomite. As a result: (1) individual well yields vary widely, depending upon the water volume in the fractures and solution openings drilled; (2) the aquifer is recharged from local precipitation through the overlying glacial drift and/or permeable materials within the drift sequence itself. There is also appreciable leakage downward to the deep bedrock system (Hughes et al., 1966). The shallow bedrock system can serve as a source for domestic, municipal and industrial water supplies. Domestic wells usually obtain water from the upper 15 to 75 feet of the dolomite, while wells serving municipalities and industries generally penetrate 50 to 250 feet into the dolomite (Bergstrom et al., 1955).

The deep bedrock aquifer systems include the Cambrian-Ordovician aquifer system and the Mt. Simon aquifer system. The former comprises the Glenwood and St. Peter Formations of the middle Ordovician series and the Ironton and Galesville Sandstone Formations of the late Cambrian. The top of the Cambrian-Ordovician aquifer is at the top of or within the Galena-Platteville Dolomite, which also serves as the lower boundary for the shallow bedrock aquifer system. In the site locale, the contact between the Platteville Group Formations and the Glenwood Formation occurs at a depth of about 750 feet below the ground surface. The bottom of the Cambrian-Ordovician aquifer system is located in the impermeable shales and dolomites of the upper and middle parts of the Cambrian Eau Claire Formation, at a depth of about 1300 feet below the ground surface. Thus, this aquifer system spans a thickness of 550 feet (Hughes et al., 1966).

Within the Cambrian-Ordovician aquifer system, the Glenwood-St. Peter sandstone unit is widely utilized as an aquifer where water requirements are less than 200 gallons per minute (gpm). This unit has a permeability of approximately 15 gallons per day (gpd)/square foot (sq. ft.). The Ironton-Galesville sandstone unit is the major producing unit in the Cambrian-Ordovician aquifer because it has the most consistent permeability (35 gpd/sq. ft.) and thickness (200 ft.) of the aquifers in northeastern Illinois (Hughes et al., 1966).

Recharge to the Cambrian-Ordovician aquifer system is mostly from western McHenry, Kane and Kendall counties where the rocks crop out at the surface or lie immediately below the glacial drift. Additional recharge occurs directly from leakage of precipitation downward through the shallow bedrock aquifer system.

The second deep bedrock aquifer system - the Mt. Simon aquifer - is bounded above by the relatively impermeable shales and dolomites of the upper and middle parts of the Eau Claire Formation and below by the crystalline pre-Cambrian basement. With the Eau Claire Formation units functioning as an aquitard, water in the Mt. Simon aquifer occurs under leaky artesian conditions. In the vicinity of the site, the top of the Mt. Simon system is about 1,750 feet beneath the ground surface. Although the Mt. Simon Sandstone is nearly 2000 feet thick, only the uppermost 275 feet of sandstone yield potable water, because below that depth the water is too highly mineralized for most purposes (Hughes et al., 1966). The average permeability of the Mt. Simon aquifer system is approximately 16 gpd/sq. ft. (Hughes et al., 1966) and recharge is largely from the outcrop region of Cambrian rocks in central southern Wisconsin (Willman, 1971).

## 2.7 RECEPTORS

Betz is located at 333 Lombard Road in Addison, Illinois. Industrial and commercial complexes surround the facility to the south, east, and west, while the nearest residential area is one-half mile to the north. The facility is surrounded by a chain link fence to restrict public access. The security system keeps potential public exposure to contaminated areas minimal.

Surface drainage is towards the east-southeast into Salt Creek, 2.5 miles from the facility. Salt Creek is used as a flood control catchment and also receives discharge water from Addison's Water Treatment Plant. Drinking water for Addison is obtained from ground water wells. The closest well is located one-half mile east of and downgradient from the facility. The presence of large amounts of clay in the soil minimizes the potential of contamination entering Addison's drinking water supply. Air scrubbers at the facility minimize potential releases via the air route.

There are no sensitive environments within two miles of the facility.

### 3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 6 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and RAI observations.

#### SWMU 1

#### Scrubbers

**Unit Description:** This unit consists of two separate wet scrubbers used to remove particulate matter from process air in the Main Production Area and the E.P. Room. The Main Production Area unit has a scrubber flow rate of 170 gallons per minute (gpm) and a gas flow rate of 3,000 standard cubic feet per minute (scfm). The waste water holding tank has a capacity of 500 gallons and is generated at a rate of 1,400 gallons per year. The E.P. Room scrubbing unit has a scrubber flow rate of 85 gpm and a gas flow rate of 1,100 scfm. The waste water holding tank has a capacity of 175 gallons and is generated at a rate of 160 gallons per year. The waste water generated by the scrubbers is pumped from each unit and stored in SWMU No. 6.

**Date of Startup:** 1967

**Date of Closure:** Currently operating.

**Wastes Managed:** Dust particles and organic vapors from the various production processes.

**Release Controls:** The units control dust particles generated in the production processes. The units are inside, so releases would be contained inside the building. According to the facility's permit, particulate emissions shall not exceed 0.7 tons per year.

**History of Releases:** No releases from this unit have been documented.

**Observations:** During the VSI, RAI did not observe evidence of releases of fugitive emissions from the units.

**SWMU 2****Main Production Area**

**Unit Description:** This unit consists of four mixing tank with capacities of: 650, 1,000, 1,200 and 4,200 gallons. The four tanks are surrounded by a concrete trench one foot deep and one-and-one-half feet wide that is covered by a metal grate. After every use, the mixing tanks are rinsed, either with water or with solvent rinse. The rinsate is then flushed down pipes into the trench, which is sloped toward a sump pump at the north end of the area. The rinsate is pumped via overhead pipe to the hazardous waste storage tank (SWMU No. 6) where it is stored until removed by either Clean Harbors of Bedford, Massachusetts or Heritage Environmental of Indianapolis, Indiana.

**Date of Startup:** 1967

**Date of Closure:** Currently operating.

**Wastes Managed:** Approximately 15,000 gallons of hazardous waste are generated monthly from all SWMUs. Due to the nature of waste collection and storage, it is unknown what volume of waste is generated in this process. The rinsate consists of water or aromatic naphtha and small amounts of the material rinsed from the mixing tank. The aromatic naphtha is used to rinse oil-based materials from the mixing tanks. The material rinsed from the mixing tanks varies widely among separate batches and from month to month. Attachment E presents results of samples taken from the Hazardous Waste Storage Tank (SWMU No. 6).

**Release Controls:** The mixing tank where the rinsate waste is generated are surrounded by a trench which can be used to collect spills from the unit. The floor in the main production area, within the boundaries of the trench, is concrete with a protective coating. Attachment F lists the resistance of this coating, Stonclad HT, to various acids, alkalies, and chemicals.

**History of Release:** There are no records of hazardous waste releases.

**Observations:** The Main Production Area was clean and no cracks in the floor coating were visible. The trench and associated sump pump also appeared to be in good condition. The system of overhead pipes also appeared to be in good condition.

**SWMU 3****E.P. Room**

**Unit Description:** This unit consists of three mixing tank with capacities of: 780, 1,600, and 4,400 gallons. The three tanks are surrounded by a trench one foot deep and one-and-one-half feet wide that is covered by a metal grate. After every use, the mixing tanks are rinsed, either with water or with solvent rinse in the same manner as the Main Production Area tanks (SWMU No. 2). The rinsate is then flushed through pipes from the mixing tanks into the trench. The trench is sloped toward a sump pump and the waste is then pumped via overhead pipes to the Hazardous Waste Storage Tank (SWMU No. 6).

**Date of Startup:** 1967

**Date of Closure:** Currently operating.

**Waste Managed:** Approximately 15,000 gallons of hazardous waste are generated monthly from all process units. Due to the nature of waste collection and storage, it is unknown what volume of waste is generated in this process. The rinsate consists of water or aromatic naphtha and small amounts of the material rinsed from the mixing tank. The aromatic naphtha is used to rinse oil-based materials from the mixing tanks. The material rinsed from the mixing tanks varies widely among separate batches and from month to month. Attachment E presents results of samples taken from the Hazardous Waste Storage Tank (SWMU No. 6).  
Waste generated in the tote cleaning area (AOC No. 1) from the rinsing of the interior of totes is managed through the trench system in the E.P. Room and is stored in the hazardous waste storage tank (SWMU No. 6).

**Release controls:** The mixing tank where the rinsate waste is generated are surrounded by a trench which can be used to handle spills from the unit. The floor in the E.P. Room within the boundaries of the trench is concrete with a protective coating. Attachment F lists the resistance of the coating to various acids, alkalies, and chemicals. The trench and sump pump pit are covered with the same material.

**History of Release:** There are no records of hazardous waste releases.

Observations: The E.P. Room was clean and there were no visible cracks in the floor coating. There were drip pans beneath the mixing tanks where wastes were collecting. The trench and sump pump appeared to be in good condition.

SWMU No. 4                      **Truck Loading Room**

Unit Description: The truck loading room is used to load and unload tanker trucks. There is a trench system which is used to handle spills. The trenches are sloped toward a sump pump at the east end of the room which pumps wastes via overhead pipes to the Hazardous Waste Storage Tank (SWMU No. 6).

Date of Startup: 1967

Date of Closure: Currently operating.

Wastes managed: Waste rinsate is generated in this unit by cleaning out empty tanker trucks. This rinsate consists of water or aromatic naphtha and small amounts of the material rinsed from the tanker trucks. The aromatic naphtha is used to rinse oil-based materials from the tanker trucks. Water is used to rinse all other materials from the tanker trucks. The material rinsed from the tanker trucks varies widely, and the Plant Manager did not give RAI specific information concerning these materials. Attachment E presents results of samples taken from the Hazardous Waste Storage Tank (SWMU No. 6).

Release Controls: The floor of the truck loading room is covered with an epoxy coating. No specifications concerning the resistance of this coating were available at the time of the VSI. There is a system of trenches in the area that is pitched toward a sump pump used to contain spills. The floor is sometimes rinsed down with water and this rinsate is flushed to the trench system and pumped via overhead pipes to the hazardous waste storage tank (SWMU No. 6).

History of Release: A spill occurred in 1979 in the unit. While a truck was being loaded, a coupling broke loose and five to ten gallons of petromeen, an oil-based product produced by Betz, were spilled onto gravel. Oil absorbent material was spread over the spill and all material, including the affected gravel, was put into barrels and disposed of on site. The only documentation of this release is a notation in an IEPA inspection report dated November 3, 1987, "Spill occurred in 1979,

plan was implemented, waste was contained on-site. No problems." (IEPA, 1987).

Observations: There are chips and cracks in the coating on the floor of the unit. Wastes were being collected in the sump pump pit.

**SWMU No. 5                      Incinerator**

Unit Description: The unit is located on a concrete pad outside the east wall of the building, at the southeast corner of the facility. The unit consists of an O'Mac Model 60MC incinerator. Air emissions from this unit are regulated under IEPA Operating Permit No. 79050030 which remains in effect until April 15, 1993. The rate of waste disposal should not exceed 300 pounds per hour.

Date of Startup: 1967

Date of Closure: Currently operating.

Wastes Managed: The incinerator is used to burn paper bags that formerly contained product and scrap cardboard. The ash produced by burning these wastes has not been analyzed. The ash is stored in the dumpster located at the northeast corner of the East Warehouse Area and disposed of with other non-hazardous wastes.

Release Controls: This unit is located outside on a concrete pad. There is neither a scrubber nor a secondary containment system.

History of Release: All air emissions are regulated by IEPA. There are no records of hazardous waste releases.

Observations: The incinerator appeared to be in good condition; however, it was not in use while the VSI was being conducted.

**SWMU No. 6****Hazardous Waste Storage Tank**

**Unit Description:** This unit consists of a 10,000-gallon carbon-steel above-ground storage tank. The tank is located in a Tank Farm adjacent to and north of the Betz building. Attachment G is a diagram of the tank.

**Date of Startup:** 1972

**Date of Closure:** Currently operating.

**Wastes managed:** All wastes generated in SWMU Nos. 1, 2, 3, and 4 are stored in this unit for not more than 90 days, according to Betz, until collected by a waste disposal company.

**Release controls:** The unit is located outside in a diked concrete area. There is a sump pump in the area which leads to the sanitary sewer system. The sump pump is used to dispose of rain water which collects in the diked area. The sump pump is locked. Before liquid is pumped to the sewer system the material is checked for any visual or olfactory evidence of contamination. The pH of the liquid is also tested prior to using the sump pump. If the water is contaminated, it is pumped into SWMU No. 6.

**History of Release:** There are no records of hazardous waste releases.

**Observation:** The tank appeared to be in good condition. There was some liquid on the concrete beneath the hose coupling.

#### 4.0 AREAS OF CONCERN

RAI identified 2 AOCs during the PA/VSI. These are discussed below.

##### AOC 1 Tote Cleaning Area

Totes are returned to Betz after customers empty them. These totes are rinsed with water on the inside. The rinsate is vacuumed out into a drum daily and then transported to the E.P. Room (SWMU No. 3) and poured into the trench system. The outsides of the totes are rinsed with water as well, and the rinsate is then flushed down a trench system in the Tote Cleaning Area into the sanitary sewer system. The Tote Cleaning Area is an AOC because there is a possibility for hazardous rinsate waters to enter the sanitary sewer system.

##### AOC 2 Heavy Aromatic Naphtha Underground Storage Tank

An underground storage tank is located outside the facility, north of the Tank Farm. This tank is used to store heavy aromatic naphtha, a petroleum distillate product used by Betz. The Plant Manager, Earnest Trippi, informed RAI during the VSI that Betz plans to install spill prevention equipment on the tank. The tank is equipped with a cathodic protection monitor. The tank is an AOC due to the potential for a release of hazardous constituents to the soil and ground water.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 6 SWMUs and 2 AOCs at the Betz facility. Background information on the facility's location, operations, waste-generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 3 identifies the SWMUs and AOCs at the Betz facility and suggested further actions.

### SWMU 1

#### Scrubbers

#### Conclusions:

The scrubbers are located indoors and are used to remove particulate emissions from the production processes. The potential of release to environmental media is minimal and is summarized below.

Ground water: Low. The unit is indoors and the nature of wastes managed makes a potential release to ground water unlikely.

Surface Water: Low. The unit is indoors and the nature of the wastes managed makes a potential release to surface water low.

Air: Low. This unit is designed to prevent particulate emissions from entering the environment via the air route. A release from this unit would be contained inside the building.

On-Site Soils: Low. There is no exposed ground surface near the unit.

#### Recommendations:

There is a minimal potential for release from this unit. Therefore, no further action is necessary.

### SWMU 2

#### Main Production Area

#### Conclusions:

The area is indoors and located on a soundly constructed floor. The floor, trench system and sump pump pit are coated with an acid resistant coating (see Attachment F). The probability of a release to environmental media is minimal and is summarized below.

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TABLE 3

## SWMU AND AOC SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1. Scrubbers	1967 to present	None	No further action
2. Main Production Area	1967 to present	None	No further action
3. E.P. Room	1967 to present	None	No further action
4. Truck Loading Room	1967 to present	None	Floor should be repaired, and a new floor coating applied
5. Incinerator	1967 to present	None	Incinerator ash should be analyzed to ensure no hazardous constituents are present
6. Hazardous Waste Storage Tank	1972 to present	None	Increase capacity of secondary containment

AOC	Operational Dates	Evidence of Release	Suggested Further Action
1. Tote Cleaning Area	1985 to present	None	Floor should be covered with a chemically-resistant coating.
2. Heavy Aromatic Naphtha Underground Storage Tank	Unknown to present	None	A follow-up inspection should confirm the installation of spill protection equipment.

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Ground water: Low. The unit is indoors on a solid concrete floor. The floor, trench system and sump pump pit are coated with an acid resistant coating (see Attachment F).

Surface Water: Low. The unit is indoors, and the nearest surface water is 0.25 mile away.

Air: Low. There is an air scrubber in the unit which is used control the release of dust particles.

On-Site Soils: Low. There is no exposed ground surface near the unit.

Recommendations: Due to the minimal potential for release via environmental media and adequate waste management practices in this unit, no further action is recommended.

#### SWMU 3

#### E.P. Room

Conclusions: The area is indoors and located on a soundly constructed floor. The floor, trench system and sump pump pit are coated with an acid resistant coating (see Attachment F). The probability of release to environmental media is minimal and is summarized below.

Ground water: Low. The unit is indoors on a solid concrete floor. The floor, trench system and sump pump pit are coated with an acid resistant coating (see Attachment F).

Surface Water: Low. The unit is indoors, and the nearest surface water is .25 mile away.

Air: Low. There is an air scrubber in the unit which is used to control the release of dust particles.

On-Site Soils: Low. There is no exposed ground surface near the unit.

Recommendations: Due to the minimal potential for release via environmental media and adequate waste management practices in this unit, no further action is recommended.

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**SWMU 4**

**Truck Loading Room**

**Conclusions:**

The Truck Loading Room is indoors and located on a soundly constructed floor. There are two large roll-up doors located at the north end of the room. The probability of a spill to environmental media is moderate. The floor is coated with epoxy and the trench system and sump pit are coated with an acid resistant coating. The potential for release via environmental media is summarized below.

Ground water: Moderate. The unit is indoors. There are chips and cracks in the concrete floor.

Surface Water: Low. Although the unit is 0.25 mile from the nearest surface water, a large spill could potentially move across the floor and exit the building.

Air: Low. Chemicals are transferred between storage tanks and tanker trucks via hoses and pipes.

On-Site Soils: Moderate. There is exposed ground surface near the unit. A large spill could potentially move across the floor and exit the building. There are chips and cracks in the concrete floor.

**Recommendations:**

The floor in the area should be repaired and a new chemically-resistant coating applied.

**SWMU 5**

**Incinerator**

**Conclusions:**

The incinerator is located outdoors on a soundly constructed concrete pad. The ash generated by burning product bags and cardboard has not been tested and is disposed of with non-hazardous waste. The probability of a release of hazardous waste to environmental media is therefore unknown.

**Recommendations:**

The ash waste should be analyzed for hazardous waste characteristics and managed accordingly.

RELEASED  
DATE \_\_\_\_\_  
RIN # 00193-00  
INITIALS P1T



**SWMU 6**

**Hazardous Waste Storage Tank**

**Conclusions:**

The storage tank is located on a diked concrete pad. The potential of release to environmental media is minimal and is summarized below.

Ground water: Low. The unit is located on a diked concrete pad. If the integrity of the storage tank is breached, the potential for a release would be high due to the low volume of secondary containment capacity. In the event of a large spill, wastes would likely be flushed to the sanitary sewer system.

Surface Water: Low. The nearest surface water is 0.25 mile from the facility. If the integrity of the storage tank is breached, the potential for a release would be high due to the low volume of secondary containment capacity.

Air: Low. Wastes are transferred to the storage tank via pipes.

On-Site Soils: Low. The storage tank is located on a diked concrete pad. Although unlikely, a large spill could potentially overflow the capacity of the secondary containment system.

**Recommendations:**

Increase the secondary containment capacity to accommodate the entire capacity of the tank.

**AOC 1**

**Tote Cleaning Area**

**Conclusions:**

The unit is indoors and located on a soundly constructed concrete floor. The probability of a spill is moderate because both hazardous and non-hazardous wastes are generated in this area but are supposed to be managed separately. The potential for release via environmental media is summarized below.

Ground water: Low. The unit is indoors on a solid concrete floor.

Surface Water: Low. The nearest surface water is 0.25 mile from the facility. If hazardous wastes were spilled on the floor, there is a potential that they would be flushed to the sanitary sewer system.

RELEASED

DATE

RIN #

06173-00

INITIALS

MT

ENFORCEMENT  
CONFIDENTIAL

Air: Low. The potential for a contaminant release to the air is low since the unit is indoors and volatile compounds would most likely have evaporated from the totes before they reached this unit.

On-Site Soils: Low. The unit is indoors. There is no exposed ground surface near the unit.

Recommendations: Due to the potential for disposing of hazardous waste with non-hazardous waste, a separate area should be designated for rinsing the interiors of the totes. Otherwise, the floor of the tote cleaning area should be covered with a chemically-resistant coating.

## AOC 2

### Heavy Aromatic Naphtha Underground Storage Tank

Conclusions: Betz plans to install spill protection equipment on this tank in the near future. At the time of the VSI the tank was not exposed, and its integrity is unknown. The potential for a spill is therefore uncertain.

Recommendations: A follow up inspection should confirm the installation of spill protection equipment.

## REFERENCES

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- Illinois Environmental Protection Agency, 1987. RCRA Inspection Form, November 3.
- OHM Corporation, 1991. "Project Summary Report, Underground Storage Tank Removal". January 19.
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- Ruffner, A. and E. Bair, 1985. Weather of U.S. Cities, vol. 1, Gale Research Co., Detroit, Michigan.
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- U.S. Geological Survey, 1980. Lombard Quadrangle, Illinois-Cook County 7.5-minute topographic series.
- U.S. Department of Housing and Urban Development, 1979. Federal Insurance Administration, National Flood Insurance Program, Village of Addison, Illinois DuPage County, Community-panel number: 170198 0007B, Effective date: March 15, 1979.
- Willman, H.B., 1971. "Summary of the Geology of the Chicago Area", Illinois State Geological Survey Circular 460, Urbana, Illinois.

**ATTACHMENT A**

**EPA PRELIMINARY ASSESSMENT FORM 2070-12**



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IL 02 SITE NUMBER ILD 009 722 281

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)  
Betz Laboratories, Inc.

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER  
333 South Lombard Road

03 CITY  
Addison

04 STATE IL 05 ZIP CODE 60101 06 COUNTY DuPage 07 COUNTY CODE 08 CONG DIST

09 COORDINATES: LATITUDE 41 55 14 . N LONGITUDE 88 \_ 01 25 . W

10 DIRECTIONS TO SITE (Starting from nearest public road)

The facility is located on Lombard Road, South of Army Trail Road.

III. RESPONSIBLE PARTIES

01 OWNER (if known)  
Betz Laboratories, Inc.

02 STREET (Business, mailing, residential)  
Somerton Road

03 CITY  
Trevose

04 STATE PA 05 ZIP CODE 19047 06 TELEPHONE NUMBER (215)355-3300

07 OPERATOR (if known and different from owner)  
Betz Laboratories, Inc.

08 STREET (Business, mailing, residential)  
333 South Lombard Road

09 CITY  
Addison

10 STATE IL 11 ZIP CODE 60101 12 TELEPHONE NUMBER (708)543-8480

13 TYPE OF OWNERSHIP (Check one)

- ☒ A. PRIVATE ☐ B. FEDERAL: (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL  
☐ F. OTHER (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

- ☒ A. RCRA 3001 DATE RECEIVED: 11/14/80 MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / / MONTH DAY YEAR ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

BY (Check all that apply)

- ☒ YES DATE 4/2/91 ☐ NO ☐ A. EPA ☐ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR  
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: (Specify)

CONTRACTOR NAME(S): Resource Applications, Inc., PRC Environmental Mgmt.

02 SITE STATUS (Check one)

- ☐ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1987 | Present ☐ UNKNOWN  
BEGINNING YEAR ENDING YEAR

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Chromium; Naphtha

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Site is in an industrial area with no evidence of soil contamination and a low potential for ground water contamination, though ground water is the source of drinking water for Addison.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

- ☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time-available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT

Kevin Pierard

02 OF (Agency/Organization)

U.S. EPA

03 TELEPHONE NUMBER

(312)886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT

Amy Sapp

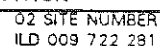
05 AGENCY

06 ORGANIZATION  
Resource Applications  
Inc.

07 TELEPHONE NUMBER  
(312)332-2230

08 DATE

5/10/91  
MONTH DAY YEAR



☐ A. TOXIC  
☐ B. CORROSIVE  
☐ C. RADIOACTIVE  
☐ D. PERSISTENT  
☐ E. SOLUBLE  
☐ F. INFECTIOUS  
☒ G. FLAMMABLE  
☐ H. IGNITABLE  
☒ I. HIGHLY VOLATILE  
☐ J. EXPLOSIVE  
☐ K. REACTIVE  
☐ L. INCOMPATIBLE  
☐ M. NOT APPLICABLE



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE  
IL

02 SITE NUMBER  
ILD 009 722 281

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

NA

01 ☐ B. SURFACE WATER CONTAMINATION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

NA

01 ☐ C. CONTAMINATION OF AIR

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

NA

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

NA

01 ☐ E. DIRECT CONTACT

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

NA

01 ☐ F. CONTAMINATION OF SOIL

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: \_\_\_\_\_  
(Acres)

04 NARRATIVE DESCRIPTION

NA

01 ☐ G. DRINKING WATER CONTAMINATION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

NA

01 ☐ H. WORKER EXPOSURE/INJURY

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

NA

01 ☐ I. POPULATION EXPOSURE/INJURY

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

NA



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE  
IL

02 SITE NUMBER  
ILD 009 722 281

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

NA

01 ☐ K. DAMAGE TO FAUNA

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION (include name(s) of species)

NA

01 ☐ L. CONTAMINATION OF FOOD CHAIN

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

NA

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

NA

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

NA

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

NA

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

NA

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, ~~OR~~ ALLEGED HAZARDS

NA

III. TOTAL POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

IV. COMMENTS

NA

V. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)

NA

**ATTACHMENT B**

**VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS**

## VISUAL SITE INSPECTION SUMMARY

Betz Laboratories, Inc.  
Addison, Illinois

Date: April 2, 1991

Facility Representatives: Earnest Trippi

Inspection Team: Amy Sapp, RAI  
Mike Gorman, RAI  
Gerald McLane, PRC

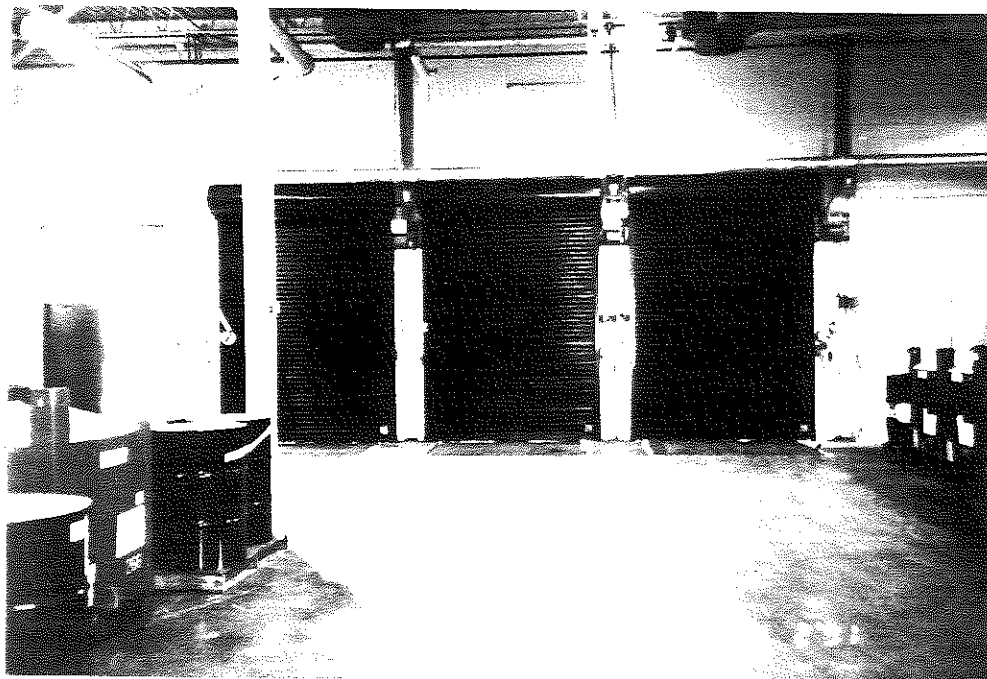
Photographer: Mike Gorman, RAI

Weather Conditions: Sunny, 70°F

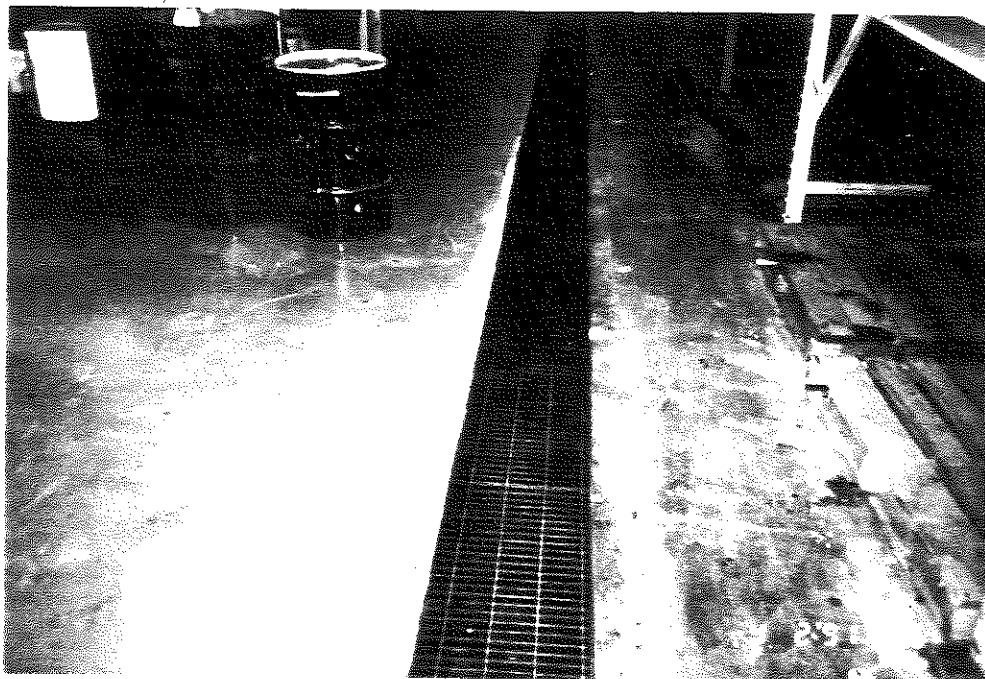
Summary of Activities: The inspection team met with Ernest Trippi, Plant Manager at Betz. The VSI consisted of an entrance meeting to discuss facility operations and a tour of the facility to observe facility operations. RAI did not observe any problems during the VSI.



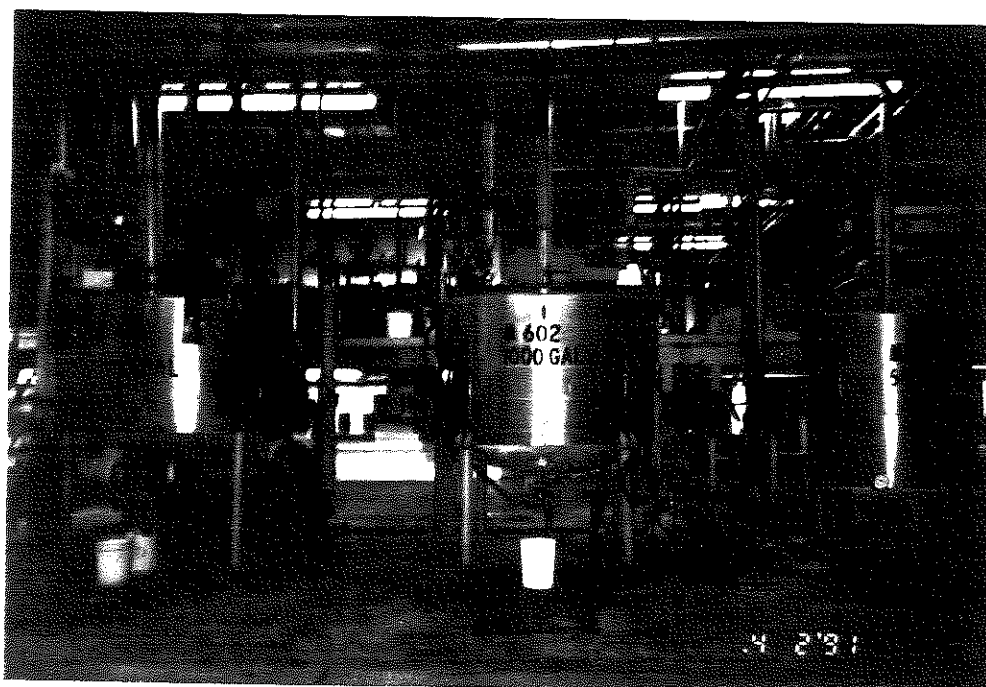
Photograph No.: 1                      Title: Product Storage  
 Location: West Warehouse Area                      Orientation: East                      Date: April 2, 1991  
 Description: Raw materials and product are stored in portable, stackable 350-gallon totes.



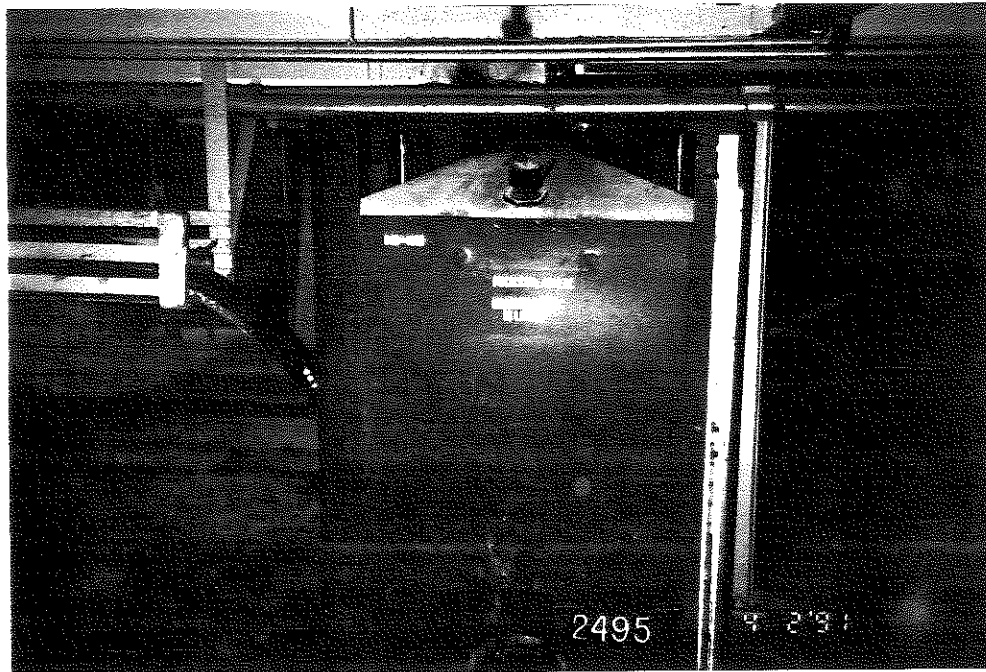
Photograph No.: 2                      Title: Shipping and Receiving Area  
 Location: West Warehouse Area                      Orientation: North                      Date: April 2, 1991  
 Description: Raw materials and product, stored in 350-gallon totes and various other types of containers, are loaded on and unloaded from trucks.



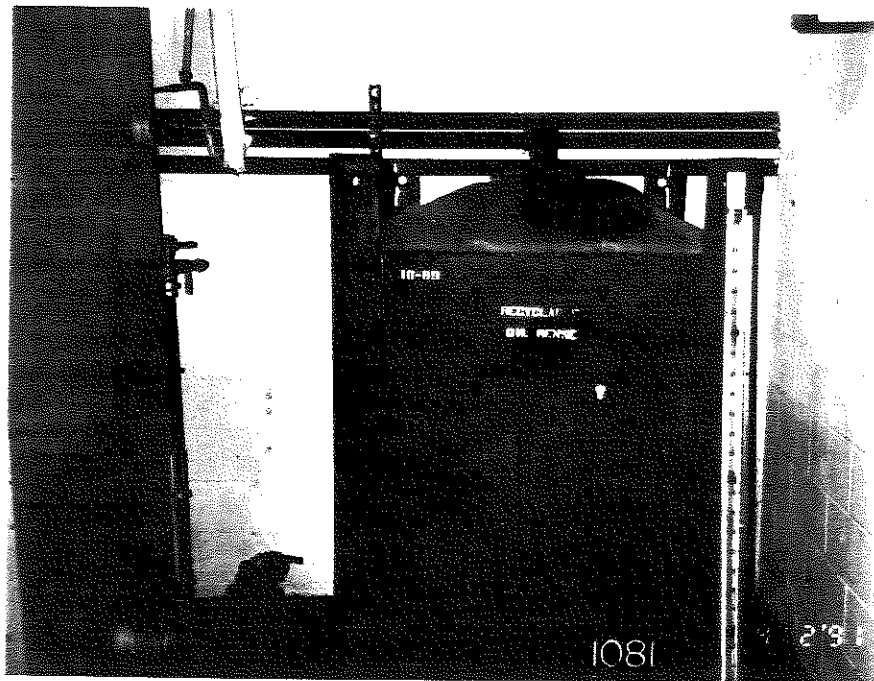
Photograph No.: 3                      Title: Trench Surrounding Temporary Product Storage Tanks  
 Location: Main Production Area                      Orientation: North                      Date: April 2, 1991  
 Description: Five temporary product storage tanks are surrounded by a trench which is sloped toward a sump pump.



Photograph No.: 4                      Title: Mixing Tanks  
 Location: Main Production Area                      Orientation: East                      Date: April 2, 1991  
 Description: Three mixing tanks are used to blend chemicals. These tanks are surrounded by a trench pitched toward a sump pump located along the north wall (see photograph no. 11).



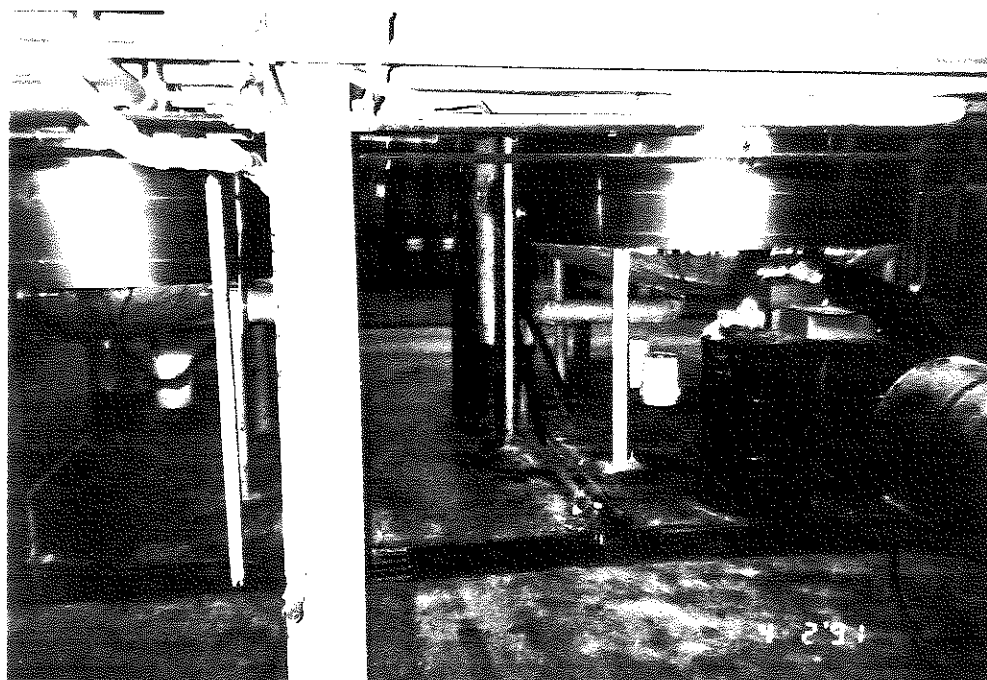
Photograph No.: 5      Title: Storage Tank for Recyclable Chromium Rinse Water  
 Location: Main Production Area      Orientation: West      Date: April 2, 1991  
 Description: A portable 350-gallon tote is used to store chromium-contaminated rinse water, generated by rinsing mixing tanks (see photograph no. 4). This rinsate is reused in the chemical blending process.



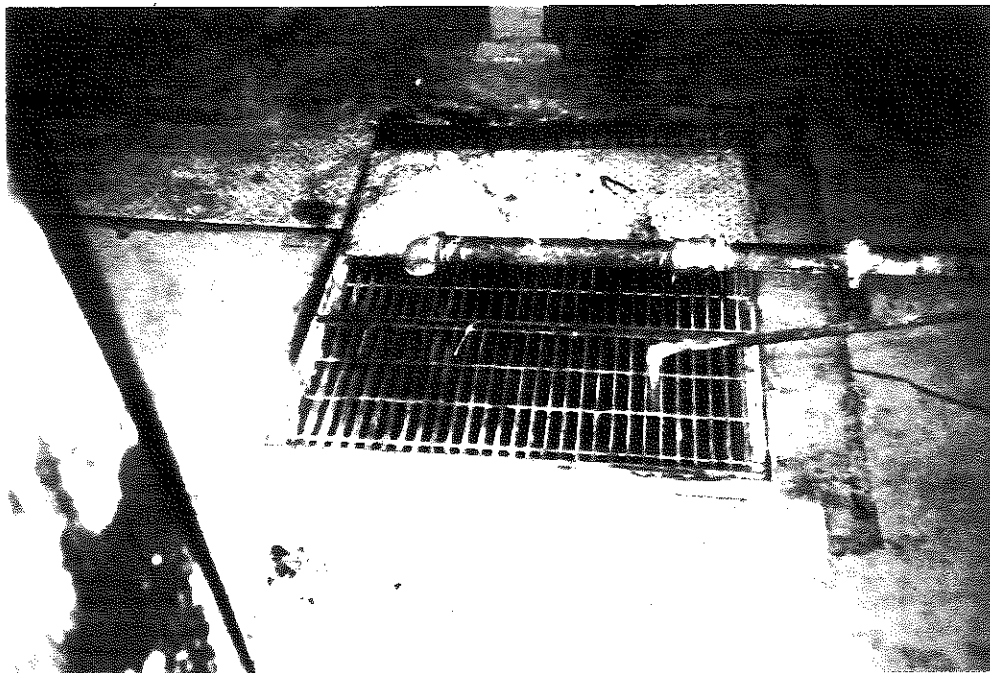
Photograph No.: 6      Title: Storage Tank for Recyclable Solvent Rinse  
 Location: Main Production Area      Orientation: North      Date: April 2, 1991  
 Description: A portable 350-gallon tote is used to store oil-contaminated solvent rinse, generated by rinsing mixing tanks (see photograph no. 4). This rinsate is reused in the chemical blending process.



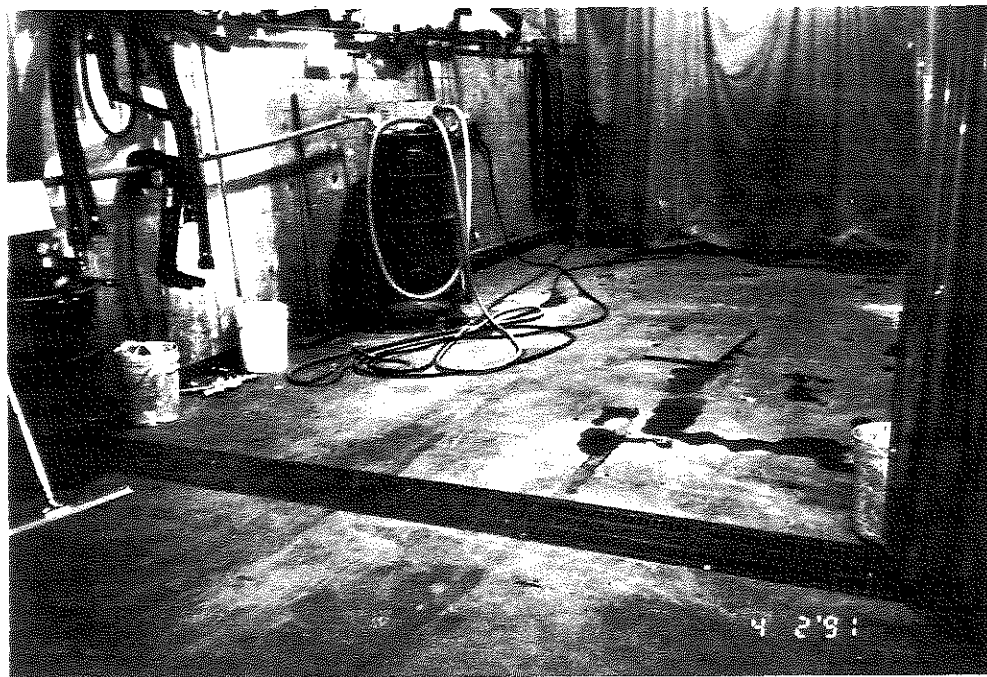
Photograph No.: 7                      Title: Storage Tank for Recyclable Polymer Rinse Water  
 Location: Main Production Area                      Orientation: West                      Date: April 2, 1991  
 Description: A portable 350-gallon tote is used to store polymer-contaminated rinse water, generated by rinsing mixing tanks (see photograph no. 4). This rinsate is reused in the chemical blending process.



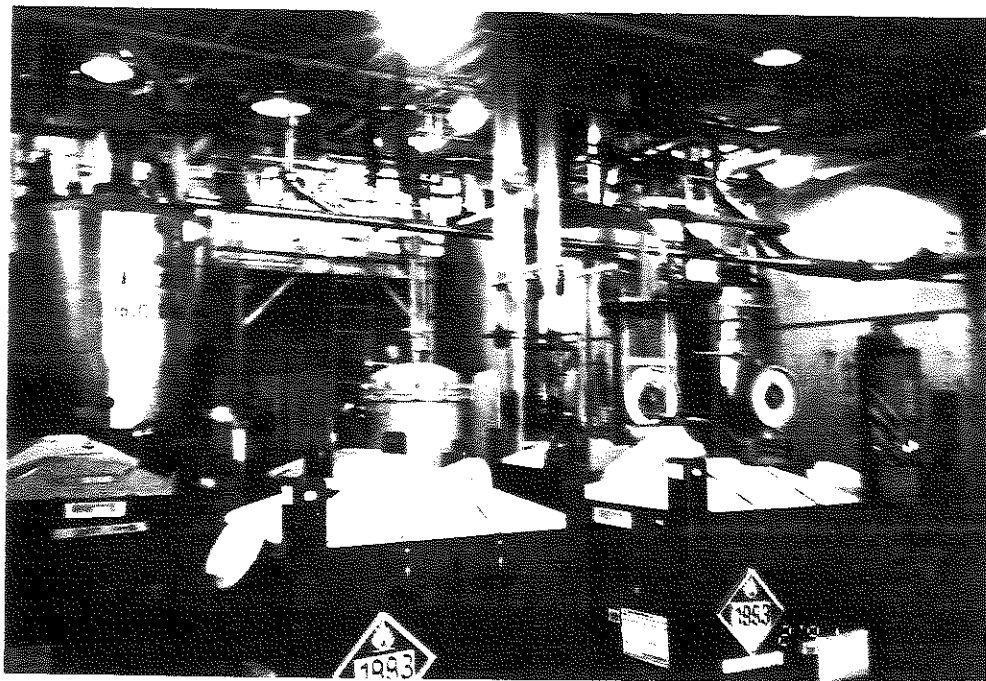
Photograph No.: 8                      Title: Mixing Tank Drainage Pipe and Trench  
 Location: Main Production Area                      Orientation: West                      Date: April 2, 1991  
 Description: Mixing tanks are rinsed with water after every batch is produced. The rinse water is drained from the tanks into a trench (see photograph no. 3).



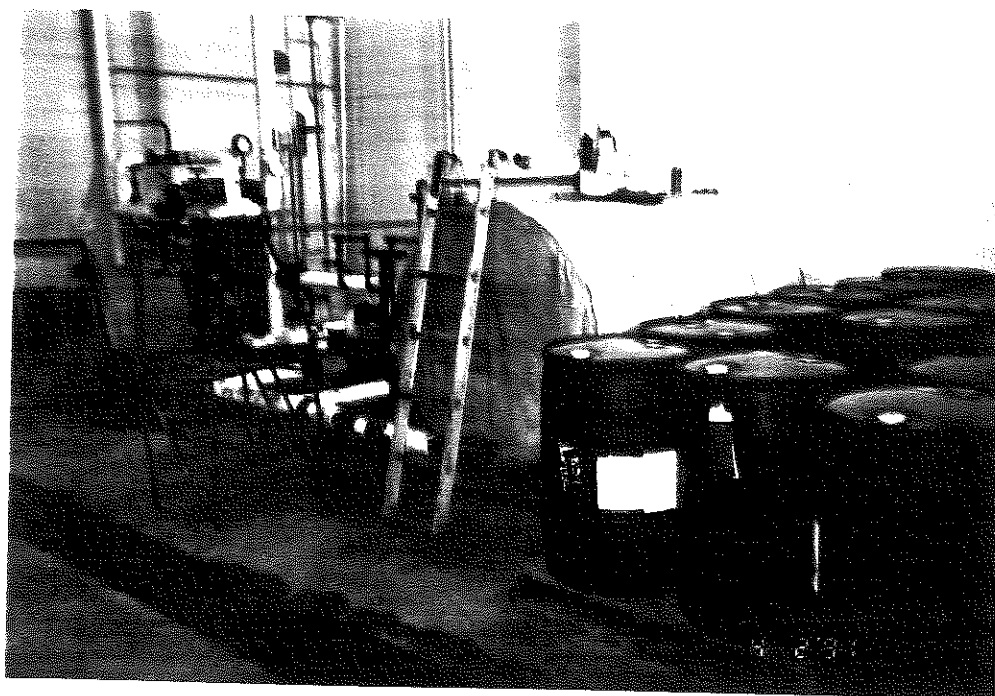
Photograph No.: 9                      Title: Sump Pump  
 Location: Main Production Area      Orientation: West                      Date: April 2, 1991  
 Description: Trench surrounding mixing tanks (see photograph no. 8) is sloped toward this sump pump which pumps water through underground pipes to the Hazardous Waste Storage Tank (see photograph no. 22).



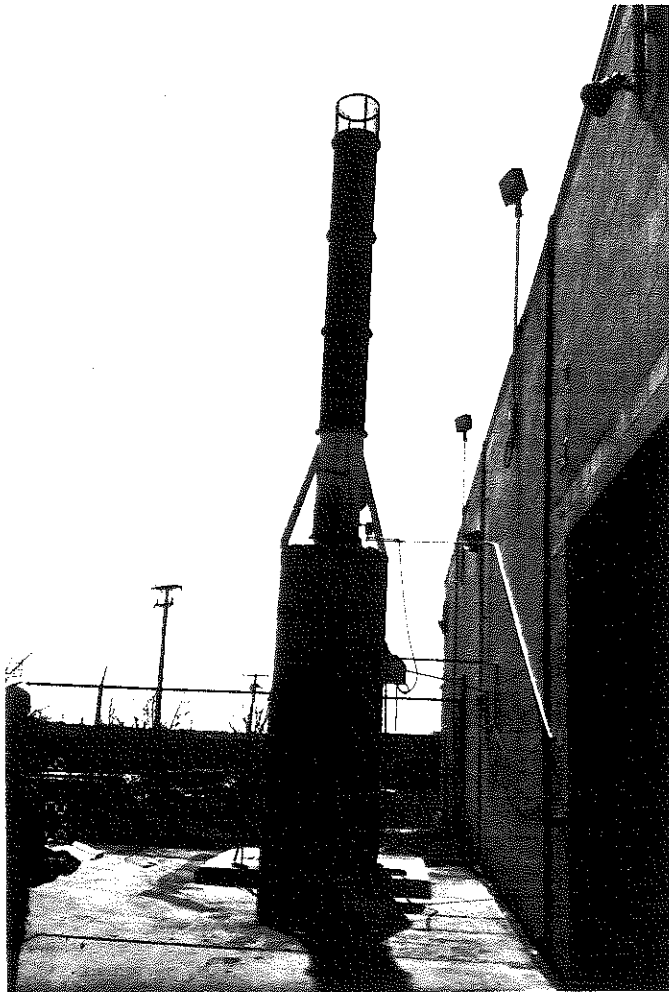
Photograph No.: 10                      Title: Tote Cleaning Area  
 Location: East Warehouse Area      Orientation: North                      Date: April 2, 1991  
 Description: 350-gallon totes, formerly containing product or raw materials, are rinsed with water. The rinse water from the interior of the totes is taken to the trench in the E.P. Room (see photograph no. 14). Rinse water from the exterior of the totes flows into the trench in the Tote Cleaning Area and flows into the sanitary sewer systems.



Photograph No.: 11                      Title: Mixing Tanks  
 Location: E.P. Room                      Orientation: Northwest                      Date: April 2, 1991  
 Description: Three tanks, 4400-gallons, 1,600-gallons and 780-gallons, are used to blend chemicals. These tanks are surrounded by a trench pitched toward a sump pump located along the North wall.



Photograph No.: 12                      Title: Ethylene Glycol Tracing System  
 Location: E.P. Room                      Orientation: Northeast                      Date: April 2, 1991  
 Description: This tank contains ethylene glycol and is part of a closed system which pumps ethylene glycol to outdoor tanks to prevent freezing in the winter.



Photograph No.: 13

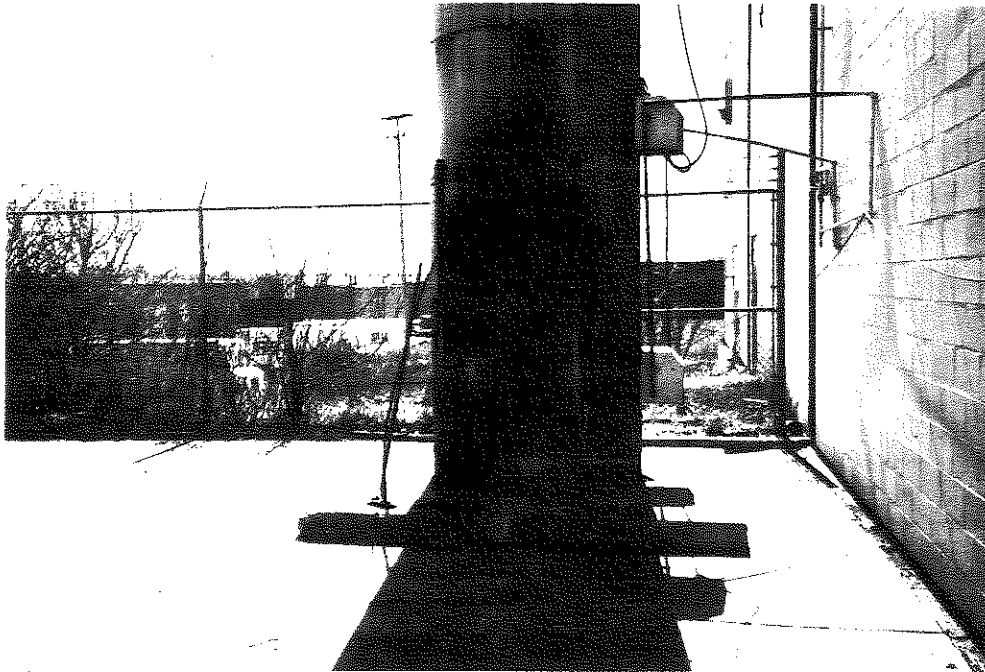
Title: Incinerator

Location: Outside east wall, Southeast corner of building

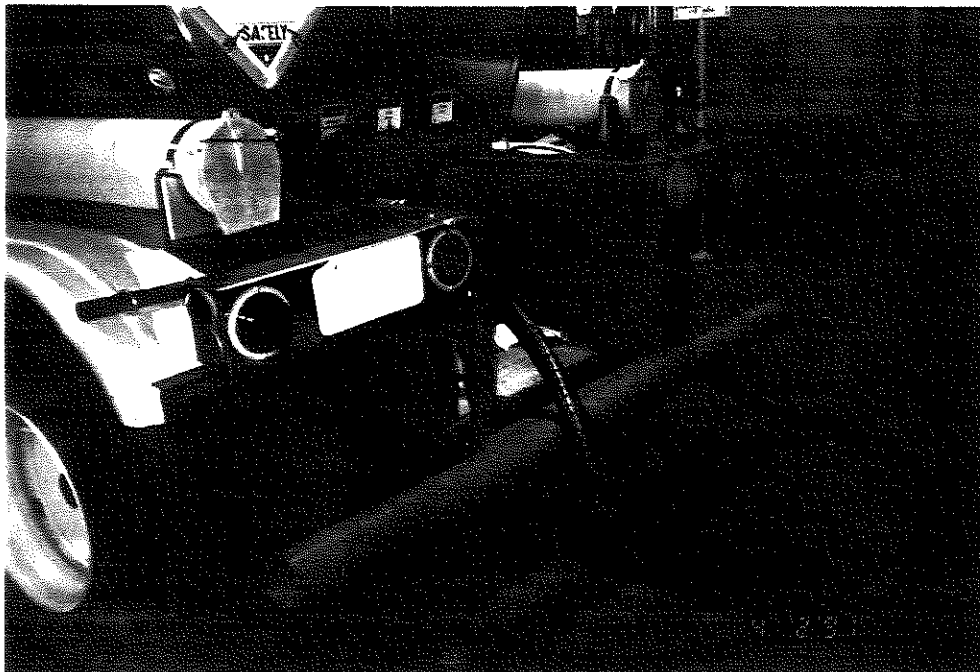
Orientation: South

Date: April 2, 1991

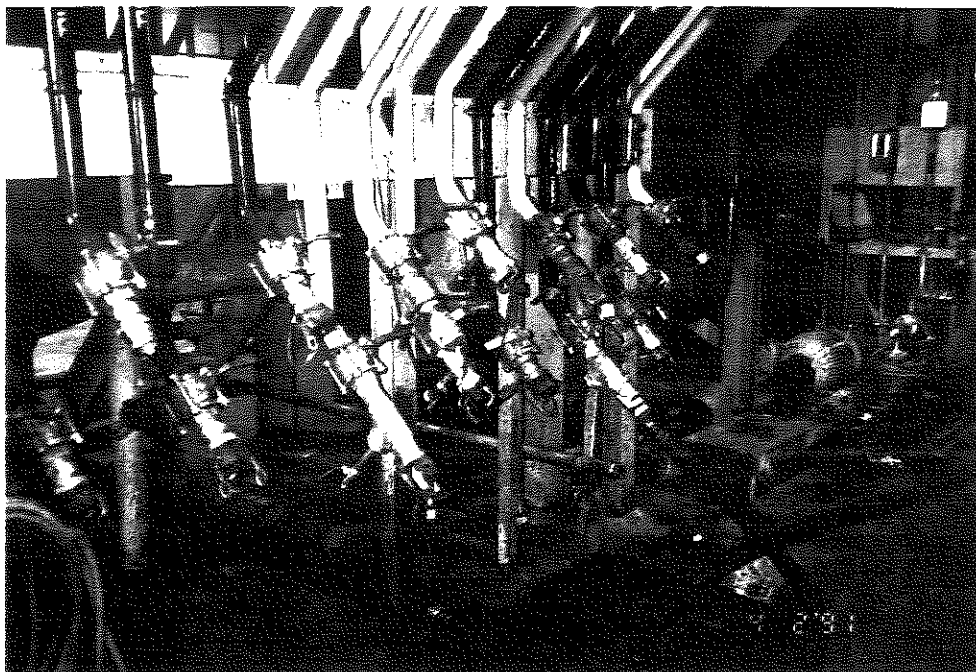
Description: This incinerator is used to burn paper bags that formerly contained raw materials.



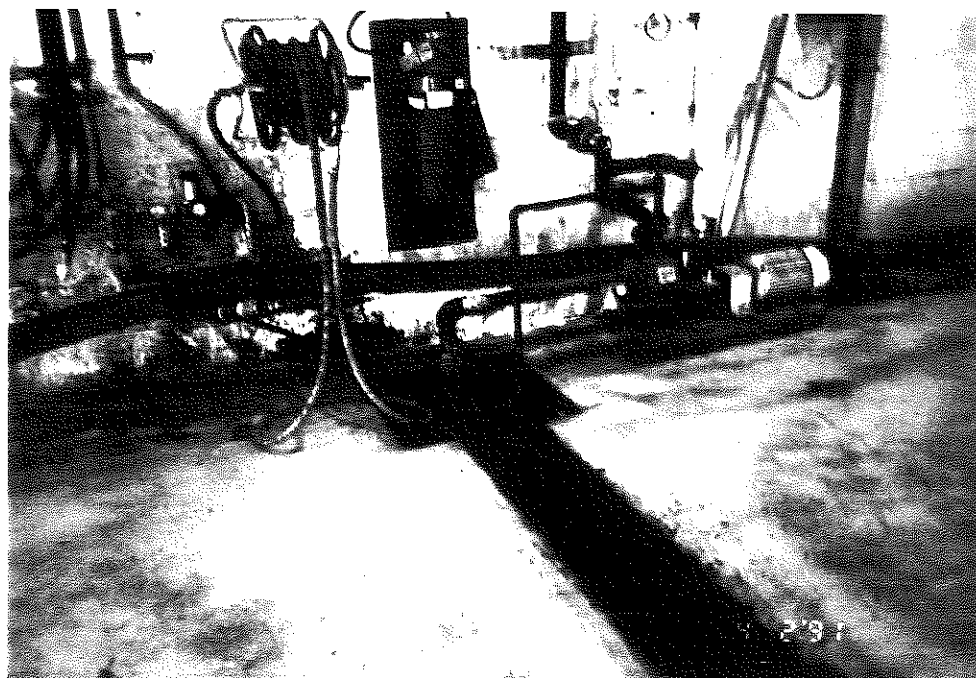
Photograph No.: 14                      Title: Incinerator  
 Location: Outside east wall, Southeast corner of building                      Orientation: South  
 Date: April 2, 1991  
 Description: See above.



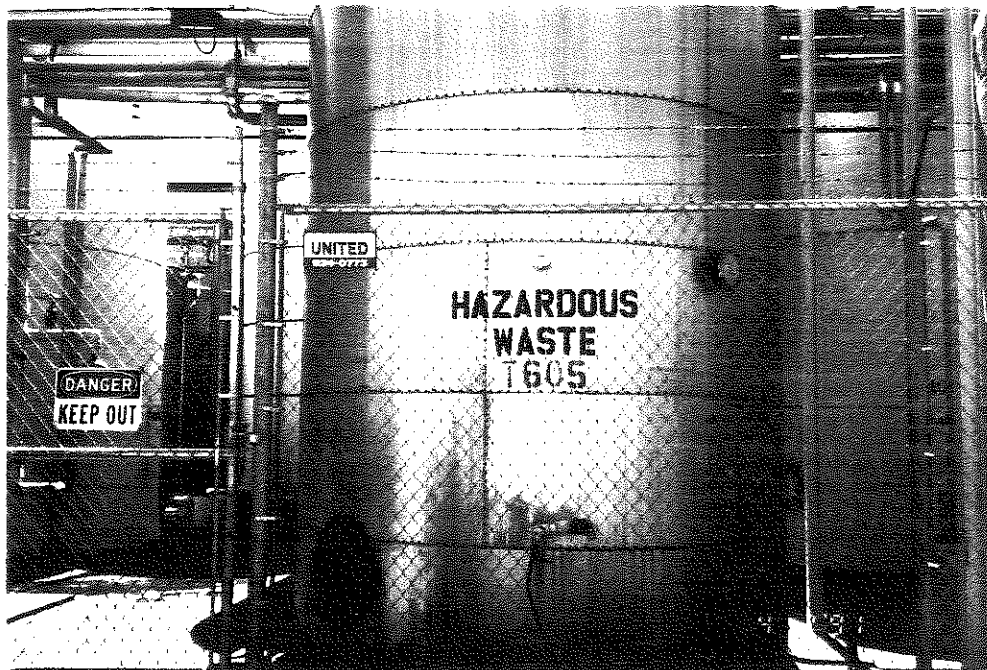
Photograph No.: 15                      Title: Truck Loading Area  
 Location: P.O.F Room                      Orientation: Northeast                      Date: April 2, 1991  
 Description: Tanker trucks are used to deliver raw materials to the facility and to deliver product to customers. (Note trench on floor).



Photograph No.: 16                      Title: Hose connectors to Bulk Product Storage Tank  
 Location: P.O.F. Room                      Orientation: Southeast                      Date: April 2, 1991  
 Description: Hose connectors are used to transfer product between the bulk product storage tanks and tanker trucks. (Note trench on floor, also chips and cracks in coating on floor).



Photograph No.: 17                      Title: Sump Pump  
 Location: P.O.F. Room                      Orientation: East                      Date: April 2, 1991  
 Description: The trench system in the P.O.F. Room is pitched toward this sump pump which is used to pump waste to the Hazardous Waste Storage Tank (see photograph no. 18).



Photograph No.: 18                      Title: Hazardous Waste Storage Tank  
 Location: Outside north wall of building                      Orientation: South                      Date: April 2, 1991  
 Description: Above-ground 10,000-gallon hazardous waste storage tank.



Photograph No.: 19                      Title: Coupling at Hazardous Waste Storage Tank  
 Location: Outside north wall of building.                      Orientation: South                      Date: April 2, 1991  
 Description: Coupling is located at the base of the Hazardous Waste Storage Tank. (Note spill beneath coupling.) The tank is on a concrete bermed pad.

**ATTACHMENT C**

**VISUAL SITE INSPECTION FIELD NOTES**

Betz Labs 4/2/91

PKC - Jerry M. - name

Carried through -

PKC - Jerry M. - name

Characterized elements -

Water based product

Summits

Water tank

To be used to reduce

Material on shelves

Product lines change regularly

by. Need to be open to products

100's of new materials on

deck right now

More than 1000 products

make here, some custom

blended

They are in the process of

getting rid of the old 170

products. Will send entire

to Eng. factory in New

Philadelphia, Pa. Will

send 1000

be limiting. The number of  
Betz facilities w/ chrome

Working down the liquid  
sodium bichromate tank  
in their tank farm.

Have chromic acid flake  
material. Once they stop  
these materials to Ohio  
they will not be using  
any more chrome at this  
facility, even as produced.  
May have a few bags of  
chromic oxide.

Clean Harbors & Heritage Env.  
Shady de watering  
Mott's ppt  
pH adjustment  
waste treatment

All wastes are collected in  
one tank.

W

The waste stream is vented to  
the disposal firms for  
chromic acid.

Clean Harbors is permitted  
since 1995.

E.T. gate is top of wall  
streets.

Redison has shallow bedrock  
aquifers - water is v. hard

Wier at Kx Michigan water  
in 1992.

Began production 1967

10,000 gal tank in place

since early 1970's. Before

that everything went to  
sewer or into drums

W

potable tanks used for  
waste storage for testing  
steel shell at potting house  
Many other portable tanks  
are used for product. Used  
to be in drum

Betz wants to be out of  
drum business by 1973. If  
lokes share up less force  
customers don't worry about  
total drum disposal

Drums in plant are from  
raw materials - no waste  
stored in tank drums.

Drummed waste before tank  
was placed? - no, it all went  
down the sewer. No central  
drummed waste storage area.

Blank chemicals brought in  
by truck - in bulk drums,  
drums,  
that products -  
for paper mill industry  
petroleum  
baker treatment  
coating driver treatment  
hydrocarbon process used by  
steel industry  
waste water treatment

many (hops) of hopper used  
for each group

ex. Boden treatment keep  
proper tickets order

Isolator at end of tank  
where materials are unloaded  
receive orders from corporate  
shuttle to make product  
a center in number of barrels  
each day

1/11

1/11

Raw materials distributed to work areas. Check code numbers to verify materials are correct.

Water is changed into batch and chemicals added.

Many heat/cold cleaning mixing

Batch sheet gives all info about what - how much, how long to mix, safety procedures, etc.

Lab here checks pH, viscosity, for QA. More complex analyses some by QA team are Philadelphia. Retain samples for 1 year.

Computerized QA data to do statistical analysis of process.

Products are shipped within 5 days usually 1-2 days.

Dr

Labels given in lab by lab - all added to product labels - should take me

Waste generation process = Residue on sides of tanks, bottom of tanks, dissolved water, products are color based. Oil base products are mixed with main in special and produced (ie. together) when mixed with water.

Recycle tank will be used for heavy amounts, regular use. Oil products will be thrown to use more water.

All oil waste collected in trench area, pumped to waste tank during

Chlorine rinse is used as  
water in next batch

Caustics also is rinse  
acids

bench is concrete pitbed  
toward sump pit which is  
connected w/ H-line epoxy resin  
coating as well as trench.

Pumped from there to tank

One sump in production area  
touch room R/F  
EP room (explosion  
safe cleaning room).

Anti make explosive products but  
anything containing flammable  
constituents are made w/ EP room.

Tank level is monitored daily and  
call for disposal as needed.

3 to 5 x per month.

3-4,000 gal. hauled each time

Non-hazardous polymers

are kept out of regular

loads and stored in drums

for maintenance work

ET products are kept

plant inspectors for some

and reported in inspection

report

If there is a problem anyone

in plant can submit a

work order request

combustibles products are

stored in explosion

safe

3000 gal. fuel tank was

removed out a company

also. It is installed as

back up is normal gas. When

used for check of tanks

Took soil borings -  
Tank was cleaned, put into  
water storage then

cleaned

2 Tanks - Ashland 140 Solvent  
in truck room  
- Heavy Aromatic Naphtha

In process of putting spill protection  
around feed piping.

The two tanks have monitoring  
unit which is checked as part  
of the weekly inspection.  
Waco Tech. maintains  
monitor yearly

No surface water discharge  
Remains - may do that in  
the future. Sewered waste  
is storm drain water and  
non-contact cooling water.

Chrome will be gone probably  
by June.

1/10

Oil permits

Administrative - permits perfected  
begin

Paul A. Annan started, registered  
submilled

~~Leak~~ - water in dry pond of tank  
filled every day.  
Boiler room  
Product storage area

✓ Steaming away storage tanks at  
franchise for spill emergency  
operation - tanks are filled  
forward pump - looked out from  
main

~~Wiring~~ ~~used~~

Worked in cooling water

Heated re/ steam from boiler  
Diner in basement - you mix it up  
as well

1/10



Had a couple tanks in East warehouse, it was once open. Enclosed in early 70's. Note wash area. French goes to sewer? →

### Maintenance room

A second product room. w/ separate scrubber system w/ 3 tanks, 1600 gallon, 8400 1780 gal tanks. French. Surrounding w/ sump pump (Alper room)

glycol & raring systems. C-4 fuelene also used to heat tanks.

Drip pan under 1600 gallon tank

Drip pan under piping. There pans are hooked w/ French. Can be changed to tank.

### Empty container storage and

#### note cleaning

Washed 100% cleaned and inside pumped into drum and emptied into EP room. French. Out side is hooked to sum and inside goes into French what flows into sewer.

Most empty drums stored on end, some on side, as on pallets.

Drum area next to empty storage containers

#### Incinerator has permit.

Deleted copy. Used to burn empty bags. Monthly. 15-20 bags in group. Planned generation

knives stored outside,  
upside down.

Flammable product (raw  
material) stored outside on concrete  
pad at trench.  
Rainwater goes out into natural  
swale near plant.

Valve on trench is left closed.

Chrome drums are triple as used.

96% of waste water

will get new incarnation w/  
about a month.

Trench loading room.

Trenches taken from storage racks of hoses  
trench boxes into trench  
loading old floor - 5x handles  
then concrete. Trenches  
lined w/ same as other trenches.

in loading room there are  
3 wooden tankers which  
are non-dedicated storage tanks  
Capable of moving product  
to EP room.

there are things, electrical boxes  
in the floor of the loading  
room.

Hoses are here for w/ loading  
New product the hoses are  
locked to prevent mistakes.

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Island 140 underground  
tank - installing spill  
prevention

liquid was collecting  
in dump.

Trenches are about 1' ~~wide~~ wide  
1 1/2' deep.

2,000 gallon <sup>500</sup> storage tanks  
are base used by bulldozer  
tank

greenish stain beneath  
concrete.

Diked area and sump.  
Test rain water in sump  
check, visual check, pH check  
let us go to sewer.

ALS

How project finally are  
directly jumped to the  
in x-ray tanks

underground

storage tank. Well install

ventilators system in it

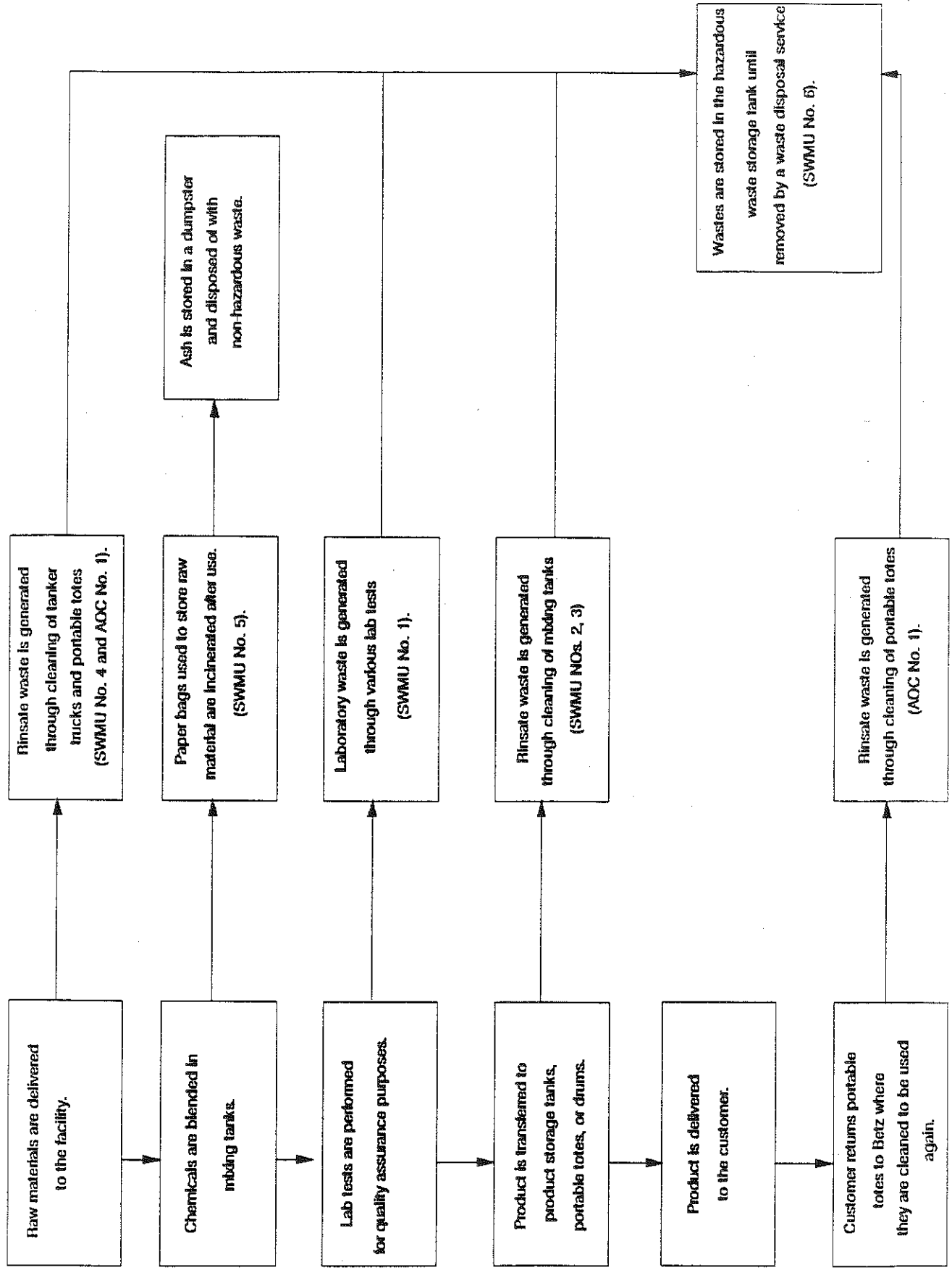
in 2 weeks

at my office & drivers

1 1/2 acres

ALS

# Betz Laboratories, Inc. Process Flow Diagram



**ATTACHMENT D**  
**PROCESS FLOW DIAGRAM**

**ATTACHMENT E**  
**SAMPLING RESULTS**



ANALYTICAL SERVICES, INC.  
BEDFORD DIVISION  
213 BURLINGTON ROAD, BEDFORD, MA 01730  
(617) 275-6111

REPORT OF ANALYSIS

Betz Labs  
333 S. Lombard Rd  
Addison, IL 60101-308

Project: TCLP  
P.O. #: 90652

Date Received: 10/29/90  
CHAS Lab #: 90X10181

Attn: Mr. Ernest Trippi

Enclosed are the results for the sample(s) delivered to our laboratory on the date indicated above.

The methods listed represent those methodologies which were used to develop the best analytical techniques. Analytical results and quality assurance protocols are based on these guidelines. These meet the requirements for the reporting of results under the RCRA, NPDES and Safe Drinking Water Act regulations.

Clean Harbors Analytical Services has an active program of quality assurance and quality control. The program closely follows the guidance provided in the EPA Contract Laboratory Program Statement of Work (organic - 7/87 and inorganic - 7/85), the guidance provided in SW-846, and many other pertinent documents.

Should you have any questions concerning this work, please do not hesitate to contact me at the number above.

Please note that samples will be held for a period not to exceed 30 days from date of final report.

The information contained in this report is, to the best of my knowledge, accurate and complete.

Per/Date:

*Louis Macri 10-7-90*

Louis Macri  
Assistant Laboratory Manager

MASSACHUSETTS RHODE ISLAND CONNECTICUT NEW YORK NEW JERSEY MAINE NEW HAMPSHIRE MARYLAND ILLINOIS

Client: Betz Labs  
 Sample I.D.: 4709  
 Sample Type: Liquid waste

CHAS Lab #: 90X10181  
 Date Received: 10/2  
 Internal Code: VS30

Volatile Organics - System D  
 Toxicity Characteristic Leaching Procedure (TCLP)  
 by EPA Method 8260 (ref. c)

Zero Headspace Extraction Date: 10/30/90

Analysis Date: 11/02/90

Parameter	MDL*	Conc.*	Parameter	MDL*	Conc.
Benzene	0.10	ND	1,1-Dichloroethylene	0.10	ND
Carbon Tetrachloride	0.10	ND	Methyl Ethyl Ketone	0.40	ND
Chlorobenzene	0.10	ND	Tetrachloroethylene	0.10	0.1
Chloroform	0.10	ND	Trichloroethylene	0.10	ND
1,2-Dichloroethane	0.10	ND	Vinyl Chloride	0.20	ND

Notes ND - Below minimum detectable level (MDL)  
 TR - Trace amount present but below MDL  
 \* - mg/l

TCLP - Toxicity Characteristic Leaching Procedure, EPA Method 1311 as described  
 in the Federal Register, Volume 55, No. 126.  
 No additional peaks observed in sample

## QA/QC

### Surrogate Recoveries:

d4-1,2-Dichloroethane: 101 %  
 d8-Toluene: 100 %  
 p-BFB: 105 %

### Surrogate Acceptance Criteria:

Water	Soil
76-114%	70-121%
88-110%	84-138%
86-115%	59-113%



Client: Betz Labs  
Sample ID: 4709  
Sample Type: TCLP

CHAS Lab #: 90X10181-01M  
Date Received: 10/29/90  
Internal Code: SS30

Semi-Volatile Base/Neutral and Acid Extractable Organics  
Toxicity Characteristic Leaching Procedure (TCLP)  
by EPA Methods 3510/8270 (ref.c)

TCLP Extraction Date: 11/12/90  
BNA Extraction Date: 11/15/90  
Analysis Date: 11/19/90

Parameter	MDL*	Conc.	Parameter	MDL*	Conc.
Total Cresols	0.13	ND	Nitrobenzene	0.13	ND
1,4-Dichlorobenzene	0.13	ND	Pentachlorophenol	0.63	ND
2,4-Dinitrotoluene	0.13	ND	Pyridine	0.13	ND
Hexachlorobenzene	0.13	ND	2,4,5-Trichlorophenol	0.63	ND
Hexachlorobutadiene	0.13	ND	2,4,6-Trichlorophenol	0.63	ND
Hexachloroethane	0.13	ND			

Notes:

ND = Below minimum detectable level (MDL)

\* = mg/l

Surrogate recovery compromised by matrix

Hydrocarbon background present

TCLP = Toxicity Characteristic Leaching Procedure, EPA Method 1311  
as described in the Federal Register, Volume 55, No. 126.

QA/QC

Surrogate Recoveries:

2-Fluorophenol	1%
Phenol-D5	11%
Nitrobenzene-D5	133%
2-Fluorobiphenyl	135%
2,4,6-Tribromophenol	168%
Terphenyl-D14	95%

Surrogate Acceptance Criteria:

25% - 121%
24% - 113%
23% - 120%
30% - 115%
19% - 122%
18% - 137%

Client: Betz Labs  
 Sample I.D.: 4709  
 Sample Type: Liquid waste

CHAS Lab #: 90X10181-  
 Date Received: 10/29/

Parameter	MDL*	Result*	Digestion Date	Analysis Date	Method Num: and Referen
Arsenic - TCLP	0.40	ND	11/14/90	11/15/90	3010/6010
Barium - TCLP	1.0	ND	11/14/90	11/15/90	3010/6010
Cadmium - TCLP	0.030	ND	11/14/90	11/15/90	3010/6010
Chromium - TCLP	0.040	0.490	11/14/90	11/15/90	3010/6010
Lead - TCLP	0.50	ND	11/14/90	11/15/90	3010/6010
Mercury - TCLP	0.0020	ND	11/30/90	12/01/90	7470
Selenium - TCLP	0.60	ND	11/14/90	11/15/90	3010/6010
Silver - TCLP	0.20	ND	11/14/90	11/15/90	3005/6010

Sample extracted on 11/12/90

Notes: ND - Below minimum detectable level (MDL)

\* - mg/l

All metal results are blank corrected.

TCLP - Toxicity Characteristic Leaching Procedure as described in the Federal Register  
 Volume 55, No. 126.

Client: Betz Labs  
Sample I.D.: 4709  
Sample Type: Liquid waste

CHAS Lab #: 90X10181-  
Date Received: 10/29  
Internal Code: PS30

Organochlorine Pesticides  
Toxicity Characteristic Leaching Procedure (TCLP)  
by EPA Methods 3510/8080 (ref. c)

TCLP Extraction Date: 11/12/90  
Organic Extraction Date: 11/15/90  
Analysis Date: 11/21/90

Parameter	MDL*	Conc.*
Endrin	0.004	ND
Lindane (Gamma-BHC)	0.004	ND
Methoxychlor	0.02	ND
Toxaphene	0.02	ND
Chlordane	0.02	ND
Heptachlor	0.004	ND
Heptachlor Epoxide	0.004	ND

Notes: \* - mg/l

ND - Below minimum detectable level (MDL)

TR - Trace amount present but below MDL

TCLP - Toxicity Characteristic Leaching Procedure, EPA Method 1311  
as described in the Federal Register, Volume 55, No. 126.

Client: Betz Labs  
Sample I.D.: 4709  
Sample Type: Liquid waste

CHAS Lab #: 90X10181-  
Date Received: 10/29

Chlorinated Phenoxy Acid Herbicides  
Toxicity Characteristic Leaching Procedure (TCLP)  
by Method 509B (ref. b)

TCLP Extraction Date: 11/12/90  
Organic Extraction Date: 11/16/90  
Analysis Date: 11/22/90

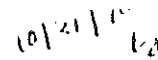
Parameter	MDL*	Conc.*
2,4-D	0.01	ND
2,4,5-TP (Silvex)	0.01	ND

Notes: \* = mg/l

ND - Below minimum detectable level (MDL)

TR - Trace amount present but below MDL

TCLP - Toxicity Characteristic Leaching Procedure, EPA Method 1311  
as described in the Federal Register, Volume 55, No. 126.

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## Method References

- (a) "Methods for Chemical Analysis of Water and Wastes," Publication EPA-600/4-79-020, U.S. Environmental Protection Agency, Environmental Monitoring and Support Laboratory, Cincinnati, 1979, revised March 1983.
- (b) "Standard Methods for the Examination of Water and Wastewater," 16th ed., American Public Health Association, American Water Works Association, Water Pollution Control Federation, Washington, D.C., 1985.
- (c) "Test Methods for Evaluating Solid Waste: Physical/Chemical Methods," 2nd ed., U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, Washington, D.C., July 1982.
- (d) "The Determination of Polychlorinated Biphenyls in Transformer Fluid and Waste Oils," Publication EPA-600/4-81-045, U.S. Environmental Protection Agency, Environmental Monitoring and Support Laboratory, Cincinnati, 1981.
- (e) "EPA-CLP Organic Analyses of Low and Medium Hazardous Waste Sample (Water and Soil) Procedures Revision," U.S. Environmental Protection Agency, July 1985.
- (f) "Test Procedures for Analyses of Organic Pollutants," Code of Federal Regulations, Appendix A, Part 136, July 1, 1985.
- (g) "Measurement of Purgeable Organic Compounds in Drinking Water by Gas Chromatography/Mass Spectrometry," Method 524, U.S. Environmental Protection Agency, Environmental Monitoring and Support Laboratory, Cincinnati.
- (h) "Prescribed Procedures for Measurement of Radioactivity in Drinking Water," Publication EPA-600/4-80-032, U.S. Environmental Protection Agency, Environmental Monitoring and Support Laboratory, Cincinnati, August 1980.
- (i) "Clean Harbors Radiological Environmental Analytical Procedures," Clean Harbors Analytical Services, Braintree, MA, October 1985.
- (j) "Methods for Chlorinated Phenoxy Acid Herbicides in Industrial Effluents," MDQARL, Cincinnati, November 23, 1973.
- (k) "Annual Book of Standards," Section 11: Water and Environmental Technology, Vols. 11.01-11.04, American Society for Testing and Materials, Philadelphia, 1983, 1984, 1985.
- (l) "Methods for Benzidine, Chlorinated Organic Compounds, Pentachlorophenol and Pesticides in Water and Wastewater," U.S. Environmental Protection Agency, September 1978.
- (m) "Methods for Organochlorine Pesticides in Industrial Effluents," MDQARL, Environmental Protection Agency, Cincinnati, November 28, 1973.
- (n) "Methods for Determination of Inorganic Substances in Water and Fluvial Sediments," Techniques of Water-Resources Investigation of the U.S. Geological Survey, Book 5, Chapter A-1, U.S. Department of the Interior, 1979.
- (o) "Measurement of Trihalomethanes in Drinking Water by Gas Chromatography/Mass Spectrometry and Selected Ion Monitoring," Method 501.3, U.S. Environmental Protection Agency, Environmental Monitoring and Support Laboratory, Cincinnati.
- (p) "The Analysis of Trihalomethanes in Finished Waters by the Purge and Trap Method," U.S. Environmental Protection Agency, Environmental Monitoring and Support Laboratory, Cincinnati.
- (q) "The Analysis of Trihalomethanes in Drinking Water by Liquid/Liquid Extraction," U.S. Environmental Protection Agency, Environmental Monitoring and Support Laboratory, Cincinnati.
- (r) "Official Methods of Analysis," Association of Official Analytical Chemists, 14th ed., 1984.
- (s) "Hach Handbook of Water Analysis," Hach Chemical Company, Loveland, CO, 1979.
- (t) M. Prichard and T.F. Gesell, "Rapid Measurement of Rn-222 Concentrations in Water with a Commercial Liquid Scintillation Counter," Health Physics, Vol. 33, 1977, pp. 577-581.
- (u) "Petroleum Products and Lubricants (I): D56-D1660," Annual Book of ASTM Standards, Volume 5.01, American Society for Testing and Materials, Philadelphia, 1985.
- "Petroleum Products and Lubricants (III): D2981-Latest: Catalysts," Annual Book of ASTM Standards, Volume 5.03, American Society for Testing and Materials, Philadelphia, 1985.

**ATTACHMENT F**  
**CHEMICALLY-RESISTANT COATING SPECIFICATIONS**

# STONCLAD HT

## Product Data

## STONCLAD HT CHEMICAL RESISTANCE GUIDE

This guide is intended as an aid to determine the potential value of STONCLAD HT as a protective topping against erosive chemical spillages at temperatures up to 100°F.

Cured STONCLAD HT samples were totally immersed in the following chemicals for 90 days at normal room temperature. This is an exceedingly severe test since most floors subject to such spillages would be flushed down with water periodically.

The resistance of STONCLAD HT to various chemicals is rated with the symbols listed below and it is assumed that good housekeeping procedures are followed which include a daily flushing down with water.

E - Excellent	NR - Not Recommended
G - Good	OS - Suitable for use where
F - Fair	occasional spillages occur
	and is followed immediately
	with water flushing

### ACIDS

<u>RATING</u>		<u>RATING</u>	
Acetic - 5%	E	Maleic - 30%	G
Acetic - 10%	G	Maleic - Sat.	F
Acetic - 30%	OS	Malic - 30%	E
		Malic - 50%	E
Benzoic - Sat.	E	Monochloroacetic - 5%	G
Boric - Sat.	E	Monochloroacetic - 10%	F
		Monochloroacetic - 20%	OS
Citric - Sat.	E		
Chromic - 15%	G	Nitric - 10%	E
Chromic - 30%	F	Nitric - 30%	G
Cresylic	OS		
Diglycolic	G	Oleic	E
		Oxalic - Sat.	E
Fatty	E		
Formic - 10%	F	Pelargonic	OS
		Phosphoric - 50%	F
Heptanoic	OS	Phosphoric - 85%	NR
Hydrochloric - 15%	E	Picric - Sat.	E
Hydrochloric - 37%	G		
Hydrofluoric - 5%	E	Succinic - Sat.	E
Hydrofluoric - 10%	G	Sulphuric - 50%	E
Hypochlorous - 5%	E		
Lactic - Up to 20%	F	Tannic - Sat.	E
		Tartaric - Sat.	E
Maleic - 10%	E	Trichloroacetic - 5%	G
		Trichloroacetic - 10%	F
		Trichloroacetic - 20%	OS

The data contained herein, is based upon laboratory tests performed under carefully controlled conditions. No warranty can be expressed nor implied regarding the accuracy of this data as it will apply to plant operational use. Plant operations differ widely and results are individually affected by specific conditions which are beyond our control.

# ALKALIES and SALTS

	RATING		RATING
Ammonium Chloride - Sat.	E	Sodium Carbonate (Soda Ash) - Sat.	E
Ammonium Hydroxide - Up to 20%	E	Sodium Bicarbonate - Sat.	E
Ammonium Hydroxide - Up to 40%	G	Sodium Bisulfate - Sat.	E
Ammonium Nitrate	E	Sodium Bisulfite - Sat.	E
Ammonium Sulfate - Sat.	E	Sodium Chloride (Salt)	E
Calcium Chloride - Sat.	E	Sodium Hydroxide - Up to 50%	E
Calcium Hypochlorite - Up to 15%	G	Sodium Hypochlorite - Up to 10%	G
Copper Fluoroborate	E	Sodium Sulfate - Sat.	E
Ferric Chloride - Sat.	G	Sodium Sulfide - Sat.	E
Potassium Hydroxide - Up to 40%	E	Trisodium Phosphate - Sat.	E

# SOLVENTS and OTHER CHEMICALS

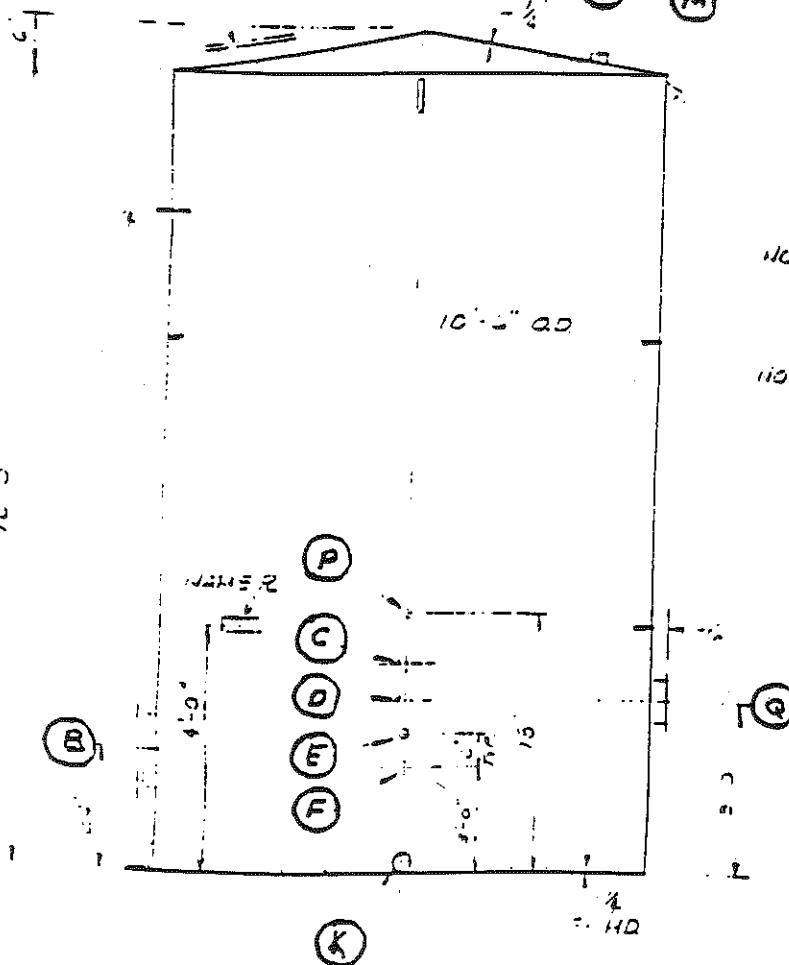
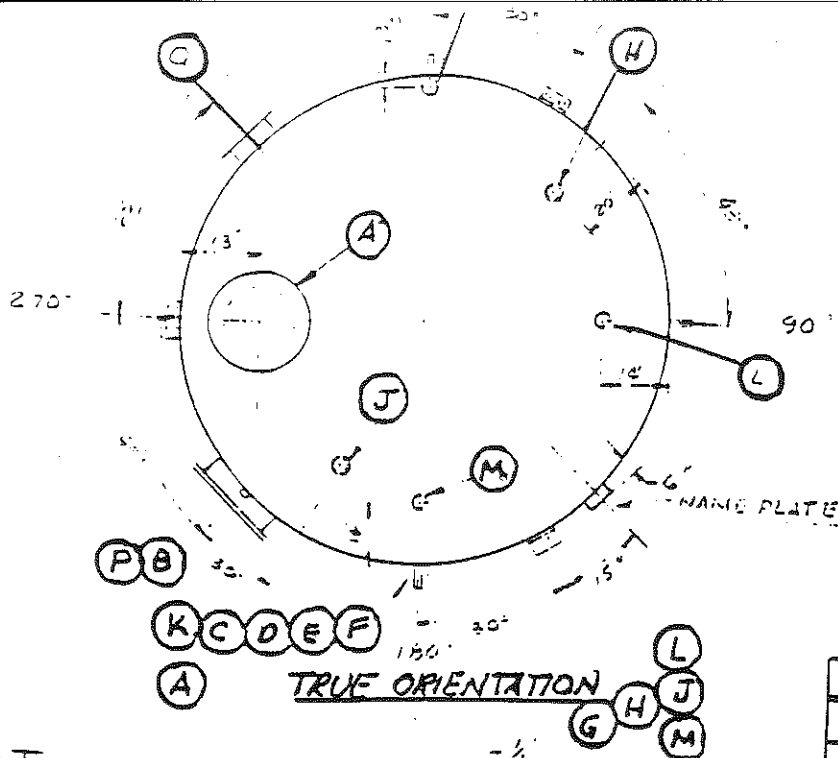
	RATING		RATING
Acetone	OS	Mayonnaise	G
Acrylonitrile	OS	Methyl Ethyl Ketone	OS
Aniline	NR	Methyl Isobutyl Ketone	OS
Alcohol (Methyl)	OS	Methyl Salicylate -	
Alcohol (Ethyl, Propyl, Isopropyl, Butyl)	G	50% in Toluene	NR
Amyl Acetate	E	Methylene Chloride	NR
Beer	E	Milk	E
Benzene	F	Mineral Spirits	E
Butyl Acetate	G	Muriatic Acid (See Hydrochloric Acid)	
Butyl Lactate	G	Mustard	E
Carbon Disulfide	NR	Naphtha	E
Carbon Tetrachloride	E	Naphthalene	G
Chlorobenzene	E	Oils - Cutting	E
Corn Oil	E	Oils - Mineral	E
Cyclohexane	E	Oils - Vegetable	G
Cyclohexanol	E	Peanut Butter	E
Cyclohexanone	OS	Perchloroethylene	E
Diacerone Alcohol	E	Phenol - 5%	NR
Diethyl Phthlate	E	Pyridine	NR
Dimethyl Phthlate	E	Sucrose - Sat. (Sugar)	E
Ethyl Acetate	OS	Toluene	G
Ethylene Glycol	E	Triacetin	E
Ether	OS	Trichloroethane	G
Formaldehyde	E	Trichloroethylene	G
Gasoline	E	Triethanolamine	E
Glycerine	E	Triethylene Glycol	E
Hydrogen Peroxide - 10%	E	Urea	E
JPS Jet Fuel	E	Vinegar (Household)	E
Juices - Fruit	E	Water	E
Juices - Vegetable	E	Wine	E
Lanoline	E	Xylene	E
Lard	F		
Linseed Oil	E		

# STONHARD

STONHARD INC. Park Ave. P.O. Box 308, Maple Shade, N.J. 08052 • 609/779-7500  
 STONHARD LIMITED, 282 Duffield Road, Rexdale, Ontario M9W 3H5 • 416/675-5555  
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 OFFICES AND WAREHOUSES IN PRINCIPAL CITIES COAST TO COAST

**ATTACHMENT G**

**DIAGRAM OF HAZARDOUS WASTE STORAGE TANK**



MARK	DESCRIPTION
A	MANWAY 18" TOP
B	MANWAY 18" SIDE
C	2" HALF CPLG
D	2" HALF CPLG
E	2" HALF CPLG
F	2" HALF CPLG
G	2" HALF CPLG
H	1" HALF CPLG
J	2" HALF CPLG
K	3" HALF CPLG
L	1 1/2" HALF CPLG
M	1 1/2" HALF CPLG
P	1" HALF CPLG
Q	8" FLDG. CONN. FOR 4" T.D.

NOTE

NOTE

NAME R-2 HAVE TANK NO.  
MATE. THICKNESS AND  
DWG. NO. 038023

NOTE: CHANGES TO  
TANK, NOZZLE K,  
3" HALF CPLG,  
NOZZLE Q ADDED,  
ADD NAMEPLATE

T-605 WASTE

<b>BETZ</b>	
10,000 GAL. CS TANK	
MODIFICATION	
ADDISON, IL	
G. E. P. L. E.	6-80
VON F.	038023

2

CERTIFICATION REGARDING POTENTIAL RELEASES FROM  
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Betz Laboratories, Inc.

EPA I.D. NUMBER: ILD009722281

LOCATION CITY: 333 S. Lombard Road

STATE: Illinois, 60101

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	<u>          </u>	<u>X</u>
• Surface Impoundment	<u>          </u>	<u>X</u>
• Land Farm	<u>          </u>	<u>X</u>
• Waste Pile	<u>          </u>	<u>X</u>
• Incinerator	<u>          </u>	<u>X</u>
• Storage Tank (Above Ground)	<u>          </u>	<u>X</u>
• Storage Tank (Underground)	<u>          </u>	<u>X</u>
• Container Storage Area	<u>          </u>	<u>X</u>
• Injection Wells	<u>          </u>	<u>X</u>
• Wastewater Treatment Units	<u>          </u>	<u>X</u>
• Transfer Stations	<u>          </u>	<u>X</u>
• Waste Recycling Operations	<u>          </u>	<u>X</u>
• Waste Treatment, Detoxification	<u>          </u>	<u>X</u>
• Other <u>                                </u>	<u>          </u>	<u>X</u>

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

N/A

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

N/A

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4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

N/A

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I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Ernest M. Trippi, Plant Manager  
Typed Name and Title

*Ernest M. Trippi*  
Signature

1-27-86  
Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HR-12

March 20, 1991

Mr. Earnest Trippe  
Plant Manager  
Betz Laboratories, Inc.  
333 S. Lombard Road  
Addison, IL 60101

Re: Visual Site Inspection  
Betz Laboratories, Inc.  
ILD 009 722 281

Dear Mr. Trippe:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.

The VSI has been scheduled for April 2, 1991. The inspection team will consist of Amy Sapp and William Dytrych of Resource Applications, Inc. and Jerry McLane, PRC Environmental Management, Inc., contractors for the U.S. EPA.

Representatives of the Illinois Environmental Protection Agency may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Enclosed is a summary of our current knowledge and data gaps.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion may be made available upon request.

Sincerely yours,

*Sheri L. Bianchin*  
for Kevin M. Pierard, Chief  
OH/MN Technical Enforcement Section

Enclosure

cc: Lorraine Morris, IEPA - Maywood  
Larry Eastep, IEPA - Land Pollution Control Division

ATTACHMENT

Betz Laboratories, Inc.  
333 S. Lombard Road  
Addison, Illinois 60101

PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUS)

1. Hazardous Waste Storage Tank - A 10,000 gallon hazardous waste storage tank is used to store rinse water generated by tank cleaning and classified by RCRA waste code D007.
2. Underground Pipeline - A pipeline is used to transport waste generated in mixing tanks to the hazardous waste storage tank.
3. Satellite Accumulation Area - Paint solvent is collected in a 55-gallon drum on site.
4. Solvent Rinse Accumulation Area - Solvent rinse generated by tank cleaning is accumulated in a 300 gallon tote. This waste is classified by RCRA waste code D001.

From the list of probable SWMUS please address the following questions:

- Do the above SWMUS still exist at the facility and are they in operation?
  - What are the start-up and closure dates of the above SWMUS?
  - What types of wastes are the SWMUS currently/formerly used for?
  - Name any SWMUS at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste.
2. Please supply as much information as possible concerning the site history. This would include any information you have regarding or any other owner/operators at this location.
  3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.
  4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

If available, the following items are requested:

- A detailed map of the facility showing the location of the SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.